

**FILED****JUN 11 2025**AT \_\_\_\_ O'CLOCK  
John M. Domurad, Clerk - Albany

UNITED STATES DISTRICT COURT  
for the  
Northern District of New York

UNITED STATES OF AMERICA	)	
v.	)	
SAMER ABDELHAK, aka "Semi,"	)	Case No. 1:25-mj-175
LEON CHEN, aka "Don Eladio,"	)	
MICHAEL HARPER, aka "Miz,"	)	
ANTHONY MEDINA, aka "Tank" and	)	
"Fatboy,"	)	
BROSLLOYD CAMPBELL,	)	
ANTHONY DIXON JR.,	)	
CHAQUILL FOSTER, aka "Lo" and	)	
"Gucci,"	)	
CHRISTOPHER SMITH, aka "Boot,"	)	
JASON HOGUE, aka "Whispers,"	)	
CHRISTOPHER CHRISTMAN, aka	)	
"Free," "Fremont," and "Puffy,"	)	
CESAR ARIEL CASTRO-SANCHEZ, aka	)	
"Dom R," and	)	
JOCELYN FOSTER, aka "Jozzy,"	)	
	)	
Defendants	)	

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

Between in or about 2021 through on or about June 11, 2025, in the counties of Albany, Essex, Fulton, Onondaga, Saratoga, and Schenectady in the Northern District of New York the defendants violated:

<i>Code Section</i>	<i>Offense Description</i>
21 U.S.C. §§ 841(a)(1) and 846	Conspiracy to distribute and possess with intent to distribute controlled substances

This criminal complaint is based on these facts:

See attached affidavit.

Continued on the attached sheet.

ROBERT WILLEY  
(Affiliate)

Digitally signed by ROBERT  
WILLEY (Affiliate)  
Date: 2025.06.10 13:54:08 -04'00'

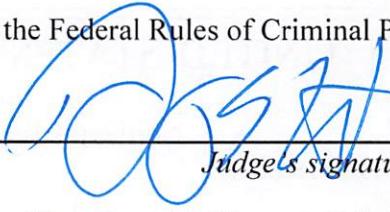
*Complainant's signature*

TFO Robert Willey, Drug Enforcement Administration

*Printed name and title*

Attested to by the affiant in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

Date: June 11, 2025

  
Judge's signature

City and State: Albany, New York

Hon. Daniel J. Stewart, U.S. Magistrate Judge

Printed name and title

FILED

JUN 11 2025  
AT O'CLOCK  
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1:25-mj-175

## AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

ROBERT WILLEY being duly sworn, deposes and states that he is a Task Force Officer with the Drug Enforcement Administration, and charges as follows:

COUNT ONE

## [Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances]

1. Between in or about 2021 and on or about June 11, 2025, in Albany, Essex, Fulton, Onondaga, Saratoga, and Schenectady Counties in the Northern District of New York, and elsewhere, the defendants, SAMER ABDELHAK, aka "Semi," LEON CHEN, aka "Don Eladio," MICHAEL HARPER, aka "Miz," ANTHONY MEDINA, aka "Tank" and "Fatboy," BROSLLOYD CAMPBELL, ANTHONY DIXON JR., CHAQUILL FOSTER, aka "Lo" and "Gucci," CHRISTOPHER SMITH, aka "Boot," JASON HOGUE, aka "Whispers," CHRISTOPHER CHRISTMAN, aka "Free," "Freemont," and "Puffy," CESAR ARIEL CASTRO-SANCHEZ, aka "Dom R," and JOCELYN FOSTER, aka "Jozzy," and others known and unknown, conspired to knowingly and intentionally distribute and possess with intent to distribute one or more controlled substances, in violation of 21 U.S.C. §§ 841(a)(1) and 846.

2. As to defendant SAMER ABDELHAK, aka "Semi," that violation involved 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, also a Schedule II controlled substance, and 1,000 kilograms or more of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of 21 U.S.C. § 841(b)(1)(A).

3. As to defendants LEON CHEN, aka "Don Eladio," CHRISTOPHER CHRISTMAN, aka "Free," "Freemont," and "Puffy," BROSLLOYD CAMPBELL, and ANTHONY DIXON JR., that violation involved 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, and 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, also a Schedule II controlled substance, in violation of 21 U.S.C. § 841(b)(1)(A), and 100 kilograms or more of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of 21 U.S.C. § 841(b)(1)(B).

4. As to defendants MICHAEL HARPER, aka "Miz," ANTHONY MEDINA, aka "Tank" and "Fatboy," and CESAR ARIEL CASTRO-SANCHEZ, aka "Dom R," that violation involved 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, and 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, also a Schedule II controlled substance, in violation of 21 U.S.C. § 841(b)(1)(A).

5. As to defendants CHAQUILL FOSTER, aka "Lo" and "Gucci," and JASON HOGUE, aka "Whispers," that violation involved 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, and 1,000 kilograms or more of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of 21 U.S.C. § 841(b)(1)(A).

6. As to defendant CHRISTOPHER SMITH, aka "Boot," that violation involved 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(b)(1)(A).

7. As to defendant JOCELYN FOSTER, aka "Jozzy," that violation involved cocaine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(b)(1)(C).

The bases for my knowledge and for the foregoing charge are, in part, as follows:

8. I am an Investigator in the SIU Narcotics Unit with the Town of Colonie Police Department ("CPD") in Latham, New York. I joined the CPD in July 2010 and was promoted to Investigator in September 2015. I have been a Task Force Officer ("TFO") with the Drug Enforcement Administration ("DEA") assigned to the Albany Field Office since January 2019.

9. I have directly participated and assisted in hundreds of narcotics investigations during my tenure with law enforcement. I have also attended numerous narcotics-related trainings provided by local, state, and federal agencies. As a TFO with the DEA, I have worked on investigations involving drug trafficking, organized crime, transnational organized crime, and violent street gangs. I have received training and have experience in interviewing and interrogation techniques, arrest procedures, search and seizure, narcotics-related crimes, and various other crimes. In the course of conducting and assisting with DEA investigations, I have been involved in the use of investigative techniques including interviewing confidential sources and cooperating witnesses, surveillance and electronic monitoring, retrieval and analysis of telephone data, financial analysis, monitoring of social media websites, and the execution of search and arrest warrants.

10. Through my training, education, and experience, I have become familiar with the manner in which illegal drugs are imported and distributed, the method of payment for such drugs, the various ways drug money is laundered, and the efforts of persons involved in such activities to avoid detection by law enforcement. Members of the DEA Albany Field Office also have extensive experience in drug investigations, especially involving high-level narcotics traffickers. I have had many informal exchanges of information with members of the DEA as well as other law enforcement officers.

11. This affidavit is based upon my personal participation in the investigation of this matter; conversations with other law enforcement officers and witness; the analysis of financial, property, and other records; physical and electronic surveillance; seizures of cocaine, methamphetamine, and marijuana; controlled purchases of cocaine; location information for cellphones and from tracking devices on vehicles obtained pursuant to various search warrants; and text messages, emails, and other electronic communication obtained pursuant to various search warrants.

12. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated. Where figures, calculations, and dates are set forth herein, they are approximate, unless stated otherwise.

## I. Overview

13. SAMER ABDELHAK, aka “Semi,” LEON CHEN, aka “Don Eladio,” MICHAEL HARPER, aka “Miz,” ANTHONY MEDINA, aka “Tank” and “Fatboy,” BROSLLOYD CAMPBELL, ANTHONY DIXON JR., CHAQUILL FOSTER, aka “Lo” and “Gucci,” CHRISTOPHER SMITH, aka “Boot,” JASON HOGUE, aka “Whispers,” CHRISTOPHER CHRISTMAN, aka “Free,” “Fremont,” and “Puffy,” CESAR ARIEL CASTRO-SANCHEZ, aka “Dom R,” and JOCELYN FOSTER, aka “Jozzy,” were members of a drug trafficking organization (“DTO”) that routinely sourced hundreds of kilograms of cocaine and hundreds of pounds of methamphetamine from Mexico and thousands of pounds of marijuana from California and Oklahoma. The cocaine, methamphetamine, and marijuana were trucked from California and Oklahoma to New York City and then distributed throughout New York, including in the Capital Region, North Country, Central New York, Western New York, and New York City.

14. ABDELHAK was a leader of the DTO. He obtained the cocaine, methamphetamine, and marijuana and arranged for it to be trucked to New York City. ABDELHAK then sold the cocaine, methamphetamine, and marijuana to customers throughout New York and elsewhere.

15. CHEN worked with ABDELHAK to obtain and distribute the cocaine, methamphetamine, and marijuana. He controlled a stash house for drugs and drug proceeds in an apartment at 145-38 34th Avenue, Flushing, New York (“145-38 34th Avenue”).

16. CAMPBELL, who owned a trucking company, trucked cocaine, methamphetamine, and marijuana from Los Angeles and Oklahoma to New York City for the DTO and rented warehouses used to store the drugs. DIXON worked for CAMPBELL and drove the trucks with cocaine, methamphetamine, and marijuana from Los Angeles and Oklahoma to New York City.

17. HARPER and MEDINA received multi-kilogram shipments of cocaine and multi-pound shipments of methamphetamine from ABDELHAK and CHEN, which they distributed in Western and Central New York, including to a large-scale cocaine dealer in Syracuse, New York.

18. CHAQUILL FOSTER worked with ABDELHAK and other members of the DTO to distribute cocaine and marijuana in New York City and the Capital Region. SMITH also worked with ABDELHAK and other members of the DTO to distribute cocaine and marijuana in New York City and in and around the Capital Region. He lived in a stash house rented by ABDELHAK at 69-34 184th Street, Fresh Meadows, New York (“69-34 184th Street”).

19. HOGUE obtained kilogram-quantities of cocaine from the DTO in Lake Placid, New York, where he sold the cocaine. He also ran and invested in a large-scale commercial marijuana grow in California with ABDELHAK.

20. CHRISTMAN was a courier for the DTO and transported cocaine, methamphetamine, and marijuana throughout New York for ABDELHAK, including to HARPER, MEDINA, and HOGUE. CHRISTMAN also loaded cocaine into tractor trailers in California for shipment to New York.

21. Like CHRISTMAN, CASTRO-SANCHEZ was a courier for the DTO and delivered cocaine and other drugs to HARPER and MEDINA in Central and Western New York. At the direction of CHEN, CASTRO-SANCHEZ also distributed cocaine and other drugs to purchasers in New York City and New Jersey.

22. JOCELYN FOSTER obtained cocaine from the DTO, which she sold in and around Johnstown and Gloversville, New York.

## **II. The Drug Shipments from Los Angeles to New York City**

### **A. CHRISTMAN and CAMPBELL Picking Up Pallets from the Warehouse Near JFK Airport**

23. At 9:25 a.m. on March 7, 2024, a Jeep Wagoneer rented by CHAQUILL FOSTER (“Jeep Wagoneer”) was parked in front of 69-34 184th Street, and at 1:20 and 4:02 p.m., respectively, CHAQUILL FOSTER departed and returned to 69-34 184th Street in the Jeep Wagoneer. In the meantime, at 2:10 p.m., CHRISTMAN drove his gray 2022 Honda CRV (“Honda CRV”) to a U-Haul store in Jamaica, New York, where he rented a U-Haul box truck for 10 hours (the “U-Haul”).

24. At 4:02 p.m., the U-Haul was parked in front of 69-34 184th Street, and at 4:25 p.m., CHRISTMAN exited 69-34 184th Street, got into the U-Haul, and drove to a warehouse at 144-30 157th Street, Jamaica, New York (“144-30 157th Street”), which is near John F. Kennedy International Airport (“JFK Airport”).

25. At 5:14 p.m., a white BMW (the “white BMW”) registered to CAMPBELL arrived at 144-30 157th Street. CAMPBELL exited the white BMW and directed CHRISTMAN to a specific loading dock, to which CHRISTMAN—as depicted below—backed up the U-Haul:



26. After a forklift in the warehouse loaded a pallet wrapped in green cellophane into the back of the U-Haul, CAMPBELL jumped down from the loading dock and helped CHRISTMAN close the rear of the U-Haul. CHRISTMAN then departed in the U-Haul followed two minutes later by CAMPBELL in the white BMW.

27. At 6:08 p.m., CHRISTMAN arrived at 69-34 184th Street in the U-Haul. A minute later, CHAQUILL FOSTER walked out of 69-34 184th Street and moved the Jeep Wagoneer from the driveway; CHRISTMAN then backed the U-Haul into the driveway. CHRISTMAN and CHAQUILL FOSTER spoke in the driveway of 69-34 184th Street, and after momentarily entering 69-34 184th Street, CHRISTMAN exited the front door and walked to the side of the residence, near the U-Haul, at 6:13 p.m. At 6:29 p.m., CHRISTMAN departed 69-34 184th Street in the U-Haul.

28. At 6:50 p.m., CHRISTMAN arrived at the U-Haul store in Jamaica and returned the U-Haul. Before doing so, CHRISTMAN took the green cellophane from the back of the U-Haul and threw it in a dumpster. A piece of paper taped to the cellophane included the address of a donut shop in South Gate, California, as the return address and a name with the initials W.M. at Unit 2 of 69-34 184th Street as the delivery address. CAMPBELL's cellphone number was on the sheet of paper along with instructions to call the number an hour before delivery.

29. A bill of lading and delivery receipt obtained from the freight carrier ("Freight Carrier-1") that contracted with a logistics provider to deliver the pallet include CAMPBELL's cellphone number and state that the shipment consisted of one pallet containing 13 boxes of household goods weighing 495 pounds. A photograph of the pallet from Freight Carrier-1's warehouse on February 28, 2024, is set forth below:

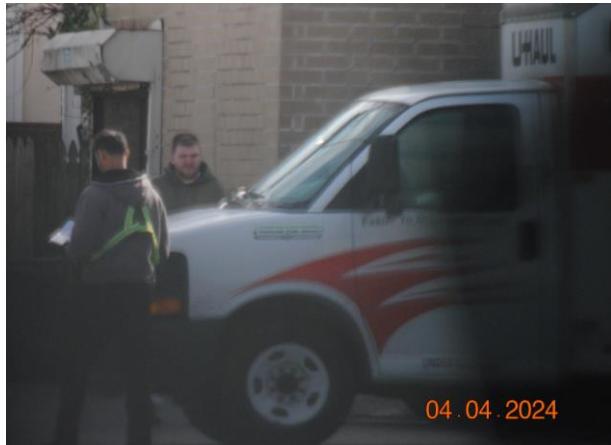


30. Based on my training, experience, and knowledge of the investigation, I believe that CHRISTMAN, assisted by CAMPBELL, picked up controlled substances in the U-Haul and delivered the controlled substances to 69-34 184th Street. In my training and experience, controlled substances—including cocaine, methamphetamine, and marijuana—are regularly shipped from California to locations throughout the United States, including New York City. CHRISTMAN picking up a shipment that was not addressed to him, but instead to W.M., and that was purportedly shipped from a donut shop in Los Angeles is consistent with an effort to conceal

the true shipper and recipient of the shipment. Further, CHAQUILL FOSTER—who, as explained below, is associated with kilogram wrappers and other cocaine-related items discovered in an apartment in Niskayuna, New York—met CHRISTMAN at 69-34 184th Street when CHRISTMAN delivered the shipment.

31. On April 4, 2024, CHRISTMAN drove the Honda CRV to a U-Haul store in Queens, New York, and rented another U-Haul box truck (“U-Haul-2”). At 3:00 p.m. the same day, U-Haul-2 was parked near 69-34 184th Street, and at 4:10 p.m., CHRISTMAN walked out of 69-34 184th Street, got into U-Haul-2, and drove to 144-30 157th Street. At 4:52 p.m., CHRISTMAN parked U-Haul-2 in the loading bay, exited the vehicle, and entered 144-30 157th Street through the front door. At 5:07 p.m., CHRISTMAN moved U-Haul-2 to a loading bay and opened the rear gate. At 5:10 p.m., a forklift loaded a pallet wrapped in pink cellophane into the back of U-Haul-2; two minutes later, CHRISTMAN closed the rear gate of U-Haul-2 and drove off.

32. A photograph of CHRISTMAN next to U-Haul-2 outside 144-30 157th Street is set forth below:



33. At 5:50 p.m., CHRISTMAN parked U-Haul-2 a few houses down the street from 69-34 184th Street, got out of U-Haul-2, and entered 69-34 184th Street. At 8:00 p.m., CHRISTMAN exited 69-34 184th Street, moved a car from the driveway of 69-34 184th Street, and backed U-Haul-2 into the driveway. CHRISTMAN and an unidentified man then took approximately eight trips carrying various-sized brown cardboard boxes from U-Haul-2 to the side entrance to 69-34 184th Street, with one of the boxes being heavy enough to require both CHRISTMAN and the man to carry it from U-Haul-2 into the residence.

34. Based on my training, experience, and knowledge of the investigation, I believe that CHRISTMAN picked up controlled substances in U-Haul-2 and delivered the controlled substances to 69-34 184th Street.

35. Freight Carrier-1 provided records for two other pallets shipped from Los Angeles to W.M. at 144-30 157th Street on March 10 and November 28, 2023, respectively. A bill of lading for the March 10 shipment states that it consisted of one pallet weighing 522 pounds and a bill of lading for the November 28 shipment states that it consisted of one pallet weighing 430 pounds. A delivery receipt for the November 28 shipment states “Brosloyd,” which is a misspelling of

CAMPBELL's given name, next to the CAMPBELL's phone number and states, "12/8 9-1pm Brosloyd."

36. On December 7, 2023, ABDELHAK texted CHRISTMAN and instructed him to rent a "short box truck" and explained "1 pallet." The next day, December 8, 2023, ABDELHAK texted CHRISTMAN the full address of 144-30 157th Street with the specific loading bay, "unit 2," from which CHRISTMAN was surveilled picking up pallets on March 7 and April 4, 2024. ABDELHAK then texted CHRISTMAN, "ETA?" At 3:13 p.m., CHRISTMAN answered, "355," and ABDELHAK responded, "Okay have boot move his car so you can back in the driveway." SMITH, who resided at 69-34 184th Street, goes by "Boot."

37. In the meantime, between November 29 and December 7, 2023, ABDELHAK texted Co-Conspirator-1 ("CC-1") about waiting for something and communicating with a third party, with CC-1 texting ABDELHAK, "They called" and "Just left there nothing yet," on December 5 and 7, 2023, respectively. At 11:56 p.m. on December 8, 2023, ABDELHAK texted CC-1, "Yoo," followed at 3:25 p.m. by, "355." At 3:39 p.m., CC-1 responded, "Bet," and at 4:04 p.m., texted ABDELHAK a receipt from Freight Carrier-1 for a shipment to W.M. at 144-30 157th Street consisting of a pallet weighing 430 pounds. A minute later, CC-1 texted ABDELHAK the following photograph of a pallet of boxes wrapped in cellphone:



38. Within seconds of CC-1 texting the receipt from Freight Carrier-1 to ABDELHAK, ABDELHAK texted the receipt to CHRISTMAN. At 4:15 p.m., CHRISTMAN texted ABDELHAK, "450," followed at 4:53 p.m. by, "Here." The receipt texted by CC-1 to ABDELHAK and then to CHRISTMAN is the same receipt for the November 28, 2023 shipment provided by Freight Carrier-1, but before certain information was whited out and CAMPBELL's name and phone number were written on it.

39. Based on my training, experience, and knowledge of the investigation, CC-1 texted ABDELHAK the receipt and photograph of the pallet to notify ABDELHAK that a shipment of drugs from Los Angeles to 144-30 157th Street had arrived. ABDELHAK in turn texted

CHRISTMAN the receipt to enable him to pick up the pallet of drugs in a rented “short box truck” and to deliver the drugs to 69-34 184th Street.

### **B. CAMPBELL’s Warehouses in Los Angeles, Tulsa, and Queens**

40. CAMPBELL owned, among other companies, Nationwide Transport, LLC (“Nationwide Transport”). ABDELHAK owned Pyramid Holdings and Management, LLC (“Pyramid Holdings”).

41. At the end of August 2024, CAMPBELL, through Nationwide Transport, leased Unit B05 of the warehouse at 901 E. 31st Street, Los Angeles, California (“901 E. 31st Street”). ABDELHAK found the warehouse for CAMPBELL and initially put CAMPBELL, whom ABDELHAK referred to as his “manager,” in touch with the management company for the warehouse. In emailing with the management company and copying CAMPBELL, ABDELHAK asked, “Can an 18 wheeler fit in this location ?” The management company responded, “Yes, 18-wheeler can fit into the loading dock.”

42. In mid-September 2024, CAMPBELL, through Nationwide Transport, leased storage unit B23 and office O2 of the warehouse at 184-60 Jamaica Avenue, Jamaica, New York (“184-60 Jamaica Avenue”). On December 9, 2024, CAMPBELL emailed the management company for 184-60 Jamaica Avenue and requested “to add t[w]o individuals with access,” including DIXON, and provided DIXON’s phone number and email address. Two days later, on December 10, 2024, CAMPBELL again emailed the management company and asked to “add the below employee to the system” above CHRISTMAN’s name, phone number, and email address.

43. Effective November 1, 2024, CAMPBELL, through Nationwide Transport, leased unit 7256 of the warehouse at 7252 – 7258 E. 38th Street, Tulsa, Oklahoma. In applying for the lease on October 16, 2024, CAMPBELL submitted doctored bank statements for a bank account held by Pyramid Holdings with ABDELHAK as signatory but with the first page of the statements reflecting Nationwide Transport as the account holder. In submitting a tenant contact form on November 22, 2024, CAMPBELL provided “Chris Smith,” i.e., SMITH, as “Local/On-Site Contact #1.”

44. On or about November 20, 2024, CAMPBELL, through Nationwide Transport, leased unit B9 of the warehouse at 5625 Firestone Boulevard, South Gate, California (“5625 Firestone Boulevard”). That day, CAMPBELL emailed a forklift operator safety certificate for DIXON to the management company for 5625 Firestone Boulevard and the management company provided a forklift operator code for DIXON. The warehouse at 5625 Firestone Boulevard, which is in Los Angeles County, is approximately 11 miles from the warehouse at 901 E. 31st Street.

### **C. The Seizure of Over 185 Pounds of Methamphetamine**

45. CAMPBELL rented a trailer for a tractor trailer and a tractor in Los Angeles through Nationwide Transport in September and November 2024, respectively (together, the “Tractor Trailer”). On October 15, 2024, CHRISTMAN and ABDELHAK entered a car rental business in Mineola, New York, with CHRISTMAN departing in a rented black Chrysler Pacifica (“Chrysler Van”).

46. At 4:12 p.m. on November 24, 2024, CHEN sent a Signal message to Co-Conspirator-2 (“CC-2”) stating, “Got a tank play,” followed by, “Drop off.” CC-2 responded, “Can we do early?” and CHEN replied, “Yes.” Over the ensuing hours, CHEN advised CC-2, “Itll be set up in hq,” followed by, “All in boxes,” CC-2 advised, “I’ll be there at HQ at 8 since it’s about a 4 hour drive,” and CHEN instructed, “Ask free what time you should show ip,” followed by, “Youll to into the garage to pick up.” When CC-2 asked, “How do I get into the garage?” CHEN explained, “My boy has the thing,” “When hes ready and everything,” followed by, “Hell have u reverse into the garage and load you up.” CC-2 asked, “Garage at Hq,” followed by, “Or he’ll hit me with a different address for pickup,” CHEN responded, “Yes hq,” and CC-2 replied, “Reversing into the garage crazy work lmfao.” In response to CC-2’s inquiry, “A lot of boxes? Should I clear out the trunk?” followed by, “I typically have clothes in there so it looks more livable,” CHEN responded, “Yea,” “Maybe two boxes,” followed by, “Max,” with CC-2 receiving the last message from CHEN at 12:48 a.m. on November 25, 2024.

47. Based on my training, experience, and knowledge of the investigation, CHEN advised CC-2 that CC-2 would deliver drugs to MEDINA, or “[T]ank,” in Western New York the following day, which CC-2 advised would be a “4 hour drive” from “HQ,” i.e., 145-38 34th Avenue. CHEN instructed CC-2 to ask CHRISTMAN, or “[F]ree,” when CC-2 should arrive at 145-38 34th Avenue to pick up the drugs for delivery to MEDINA, and that CC-2 would back into the garage at 145-38 34th Avenue to pick up a maximum of two boxes of drugs for delivery to MEDINA.

48. In the meantime, at 10:18 p.m. on November 24, 2024, CHEN sent a message to a Signal group chat with CC-2, whose Signal name was “Donnie Darko,” CASTRO-SANCHEZ, whose Signal name was “Dom R,” ABDELHAK, whose Signal name was “Sir Phukalot,” and CHRISTMAN, whose Signal name was “Sirhc,” stating: “Yo donnie, sir free will have every ready to go up by 7-8 but ask on his eta here so youll be ready.” CHEN then sent a link to the Apple Maps address for the Walmart at 3217 Silverback Lane, Painted Post, New York (“3217 Silverback Lane”), followed by, “3217 Silverback Ln Painted Post , NY,” to which CC-2 responded, “Sounds good. I’m about an hour away from HQ. I’ll text here before I head in to be there around the 7-8am mark.”

49. Based on my training, experience, and knowledge of the investigation, CHEN advised CC-2 that CHRISTMAN, or “[F]ree,” would have drugs ready to go “u[p]” to MEDINA by 7:00 or 8:00 a.m. but to ask CHRISTMAN on the Signal group chat when the drugs are ready. After CHEN sent CC-2 the address of the Walmart at which to meet MEDINA to deliver the drugs, CC-2 explained that he was approximately an hour away from “HQ,” i.e., 145-38 34th Avenue, and would message the group as instructed before departing to pick up the drugs.

50. At 6:08 a.m. on November 25, 2024, CC-2 messaged the group chat, “Heading out in 10 minutes. I should be there by 7:45,” ABDELHAK responded, “Everything delayed,” followed by, “Wait 2 hours,” to which CC-2 replied, “Sounds good.” Approximately two hours later, at 8:09 a.m., CC-2 messaged the group chat, “Be there 10am or still some more time?” “GPS says an 1 hour 20 so I’ll head out now,” followed at 9:51 a.m. by, “30 min away.” A minute later, CHEN instructed, “Donnie chill around the corner till free tells u hes going down to the garage,” to which CC-2 responded, “Okay.”

51. At 11:46 a.m., CC-2 messaged the group chat, “Eta is 4:35,” ABDELHAK responded, “How,” followed by, “Wtf,” and CC-2 replied, “That’s assuming I have to stop for gas.” At 11:47 a.m., ABDELHAK messaged, “Don’t leave yet,” CC-2 responded, “What time would they be ready,” and ABDELHAK replied, “You got the wrong load bro,” followed by, “Go back.” CHEN interjected, “He’ll be back hes dropping those off to my guy newrby,” ABDELHAK answered, “Oh okay,” followed by, “He was about to bring that to tank,” and CHEN replied, “Wait let boy take the minivan to warehouse to deliver to mang.” At 11:54 a.m., ABDELHAK responded, “Ok,” and at 12:56 p.m., CC-2 messaged, “5:20 eta,” followed by, “5:45 eta.”

52. At the same time CC-2 messaged the group, CC-2 also exchanged Signal messages with CHEN and CASTRO-SANCHEZ.

53. At 10:50 a.m. on November 25, 2024, CHEN messaged CC-2, “Yo go inside office see if free inside,” CC-2 responded, “Okay,” “No ones here but all lights are on,” followed by, “I’ll grab some empanada til he ready,” and CHEN replied, “Yo theres 4 boxes i need u to takendown,” followed by, “U [c]lose to hq.” CC-2 immediately responded, “Yea I’m right next door,” followed by, “I only saw 3 boxes sitting on the cart,” CHEN explained, “Theres one more,” and CC-2 replied, “And the top one was open so idk if it’s finished,” followed by, “I’ll head there now let me pay.” After CHEN instructed CC-2, “Take the boxes to ur car its 4 of em,” and CC-2 confirmed he picked up the four boxes, at 11:47 a.m., CHEN advised CC-2, “Those 4 boxes not going upstate,” “They going to 15415 roosevelt abe flushing,” followed by, “In 20 mins my boy will be there in a maybach.” CC-2 explained, “Okay going now,” followed by, “I’m parked on the corner of 155th,” CHEN responded, “After go back grab the minivan and ask dr phuks,” followed by, “For instructions.”

54. At 11:04 a.m., CASTRO-SANCHEZ messaged CC-2, “Haha you haven’t left to upstate yet,” CC-2 responded, “Esperando\*,” “Nah lmao,” “I just went upstairs for a wellness check,” followed by, “Tipo ni está aquí,” and CASTRO-SANCHEZ replied, “Damn poor [CC-2] they always got you waiting bro,” followed by, “So sick.” CC-2 messaged, “Hahaha es okay papi,” followed by, “Que me pagan el 600 que te querían a pagar a ti,” CASTRO-SANCHEZ replied, “Na they upped it to 800 I said na,” followed by, “Get Donnie,” and CC-2 replied, “Lmfao,” “Al diablo,” “800 and I’ll wait til tomorrow n\*\*\*a,” followed by, “My daughter can walk to school.”

55. At 12:35 p.m., CC-2 messaged CHEN, “Going back to hq,” CHEN responded, “Just wait,” followed by, “Till he says reverse,” and after CC-2 observed, “So no mini van?” and CHEN advised there would be “2-3” boxes in CC-2’s car, CC-2 messaged, “There’s no parking so I’m by the fire hydrant. Give me 5 minute warning before pulling in.” At 12:46 p.m., CHEN instructed CC-2, “Go now,” CC-2 responded, “Going,” and CHEN replied, “Two boxes.” At 12:48 p.m., CC-2 messaged CHEN, “Here,” to which CHEN responded, “3217 Silverback Ln Painted Post , NY,” “Hes coming,” followed by, “Just have urself reversed.”

56. Based on my training, experience, and knowledge of the investigation, CC-2 advised CHEN, ABDELHAK, CHRISTMAN, and CASTRO-SANCHEZ that he was headed to 145-38 34th Avenue to pick up drugs for MEDINA, but ABDELHAK told him to wait two hours because the delivery of drugs was delayed. After CC-2 arrived at 145-38 34th Avenue, CHEN instructed him to wait “around the corner” until CHRISTMAN, or “[F]ree,” advised he was going to the garage to deliver the drugs. At 11:46 a.m., CC-2 advised the group when he would arrive at the Walmart at 3217 Silverback Lane with the drugs he picked up from CHRISTMAN at 145-38

34th Avenue. ABDELHAK instructed CC-2 to return to 145-38 34th Avenue because he picked up the wrong load of drugs; CHEN advised that CC-2 was delivering drugs to a different customer; and ABDELHAK observed that CC-2 was about to bring the wrong drugs to MEDINA or “[T]ank.”

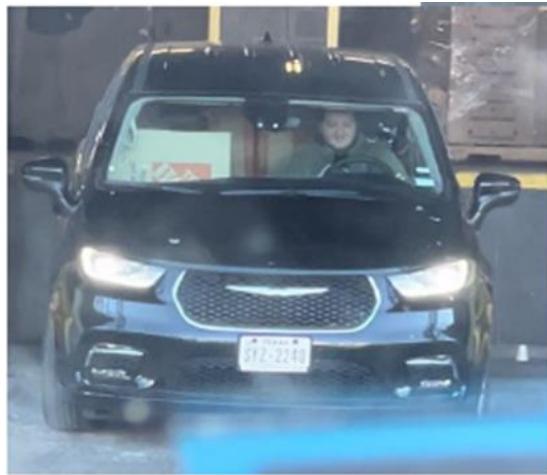
57. As revealed by CC-2’s messages with CASTRO-SANCHEZ, CASTRO-SANCHEZ was aware CC-2 was delivering drugs “upstate,” and commented on how he was asked to deliver the drugs for \$800 but declined in favor of CC-2, or “Donnie,” delivering the drugs. As revealed by CC-2’s messages with CHEN, CC-2 delivered four boxes of drugs to CHEN’s customer in Flushing, who was in a Maybach Mercedes Benz, before returning to 145-38 34th Avenue.

58. In the meantime, at 9:00 a.m. on November 25, 2024, CHRISTMAN was parked in the Chrysler Van facing the Tractor Trailer outside 184-60 Jamaica Avenue. Four minutes later, CAMPBELL arrived and spoke to DIXON, who was in the driver’s seat of the Tractor Trailer, and at 9:15 a.m., CHRISTMAN and CAMPBELL directed traffic as DIXON backed the Tractor Trailer, which had a Nationwide Transport identifier on the cab, into a loading bay at 184-60 Jamaica Avenue. At the time, the trailer of the Tractor Trailer appeared mostly full of pallets of boxes. CAMPBELL talking to DIXON in the Tractor Trailer as CHRISTMAN looks on is depicted below:



59. At 10:05 a.m., CAMPBELL stood on the step to the cab of the Tractor Trailer and spoke to DIXON; a minute later, CAMPBELL closed the door to the Tractor Trailer, which then departed. After the Tractor Trailer departed, CHRISTMAN moved multiple cardboard Home Depot boxes inside 184-60 Jamaica Avenue and loaded Home Depot boxes into the Chrysler Van.

At 10:48 a.m., CHRISTMAN pulled out of the loading bay with the Chrysler Van full of Home Depot boxes, as depicted below:



60. CHRISTMAN drove without stopping to 145-38 34th Avenue and pulled into the gated parking garage at 11:23 a.m. At 12:48 p.m., a gray Toyota Rav 4 (“gray Rav 4”) backed into the parking garage for 145-38 34th Avenue. At 12:54 p.m., the gray Rav 4 driven by CC-2 pulled out of the parking garage and departed followed minutes later by CHRISTMAN in the Chrysler Van.

61. At around 2:38 p.m., law enforcement stopped CC-2 driving the gray Rav 4 for traffic infractions on State Route 17 in Sullivan County, New York. At 2:47 p.m., CC-2 messaged CHEN, “Pulled over,” CHEN responded, “?” followed by, “To rest or,” and CC-2 replied, “Police,” “Pulled me out car,” followed by, “Deleting app now.”

62. In searching the gray Rav 4, law enforcement discovered, among other things, approximately 187.5 pounds of methamphetamine in two Home Depot boxes in the trunk. A photograph of the methamphetamine in front of the gray Rav 4 is below:



#### **D. DIXON's Other Deliveries to 184-60 Jamaica Avenue**

63. At 9:49 p.m. on December 24, 2024, DIXON opened the garage door to a loading bay at 184-60 Jamaica Avenue, walked out of 184-60 Jamaica Avenue, and started backing the Tractor Trailer into the bay. Before backing in, DIXON drove the Tractor Trailer down the street, and at 10:10 p.m., CHRISTMAN arrived at 184-60 Jamaica Avenue in a white GMC economy van (“GMC Van”), which he backed into the open loading bay.

64. At 10:19 p.m., CHRISTMAN pulled the GMC Van out of the bay; the Tractor Trailer backed into the loading bay; and DIXON exited the cab of the Tractor Trailer and entered 184-60 Jamaica Avenue. At 10:24 p.m., CHRISTMAN parked the GMC Van in front of 184-60 Jamaica Avenue, walked into 184-60 Jamaica Avenue, and the door to another loading bay to the right of the Tractor Trailer opened. CHRISTMAN then backed the GMC Van into the bay, parked, and entered the warehouse. At 10:36 p.m., DIXON exited 184-60 Jamaica Avenue, got into the driver’s seat of the Tractor Trailer, and drove off.

65. At 10:52 p.m., CHRISTMAN pulled a dolly loaded with boxes and two suitcases to unit B23, used a key to open the unit, and pulled the loaded dolly into the unit. A screenshot of the dolly as CHRISTMAN pulled it into unit B23 is set forth below:



Leaving the loaded dolly in unit B23, CHRISTMAN locked the unit and walked off at 10:55 p.m. Four minutes later, CHRISTMAN closed the door to the loading bay where the Tractor Trailer was parked, pulled the GMC Van out of the bay to the right, and closed the door to that bay and drove off in the GMC Van.

66. At 11:55 p.m., CHRISTMAN returned to 184-60 Jamaica Avenue in the GMC Van, parked in front of the warehouse, and walked down the street. A minute later, CHRISTMAN walked to unit B23 of 184-60 Jamaica Avenue, opened the door, and entered the unit. At 1:09 a.m. on December 25, 2024, a loading bay door at 184-60 Jamaica Avenue opened, CHRISTMAN walked out of the bay, and CHRISTMAN then backed the GMC Van into the bay. At 1:20 a.m., CHRISTMAN pulled the GMC Van out of the loading bay, closed the door to the bay, and drove off in the GMC Van.

67. Based on my training, experience, and knowledge of the investigation, DIXON delivered drugs to 184-60 Jamaica Avenue in the Tractor Trailer on December 24, 2024, which CHRISTMAN placed in unit B23. Later in the evening and in the early-morning hours of the next day, CHRISTMAN returned in the GMC Van and retrieved some or all of the drugs from unit B23.

68. At 7:13 a.m. on January 9, 2025, CHRISTMAN and Co-Conspirator-3 (“CC-3”) walked to unit B23 at 184-60 Jamaica Avenue and then walked away. At 7:20 a.m., DIXON arrived at 184-60 Jamaica Avenue in the Tractor Trailer, which he backed into a loading bay. Between 7:47 and 7:49 a.m., CHRISTMAN and CC-3 pulled a dolly full of boxes into unit B23 and then left the unit with the dolly empty. Between 7:50 and 7:53 a.m., CHRISTMAN and CC-3 returned with a second load of boxes on a dolly, took the loaded dolly into unit B23, and again left the unit with the dolly empty. At 7:58 a.m., DIXON pulled the Tractor Trailer out of the loading bay at 184-60 Jamaica Avenue and stopped on the street, where he closed the rear door to the trailer before driving off.

69. At 8:49 a.m., a gray 2024 Honda Accord (“gray Accord”) parked in a lot adjacent to 184-60 Jamaica Avenue. After exiting the gray Accord, CHRISTMAN and CC-3 took several empty, unassembled cardboard Home Depot boxes from the gray Accord and brought the boxes into 184-60 Jamaica Avenue. Between 8:57 and 9:10 a.m., CHRISTMAN and CC-3 returned to unit B23 with empty, unassembled cardboard Home Depot boxes on a dolly. CHRISTMAN and CC-3 took the empty boxes into unit B23 and remained in the unit for over ten minutes. Upon exiting, CHRISTMAN placed an assembled and apparently heavy Home Depot box on the dolly. After CHRISTMAN locked unit B23, he and CC-3 walked off with the Home Depot box on the dolly. At 9:13 a.m., CHRISTMAN and CC-3 walked out of 184-60 Jamaica Avenue with CHRISTMAN carrying an assembled and apparently heavy Home Depot box, which CHRISTMAN placed in the trunk of the gray Accord. CHRISTMAN and CC-3 then drove off.

70. Based on my training, experience, and knowledge of the investigation, DIXON delivered drugs to 184-60 Jamaica Avenue in the Tractor Trailer, which CHRISTMAN and CC-3 placed in unit B23. CHRISTMAN and CC-3 then used a cardboard Home Depot box to carry some or all of the drugs from unit B23, which they transported from 184-60 Jamaica Avenue in the gray Accord.

#### **E. ABDELHAK’s and CHEN’s Travel from New York City to California**

71. On January 14, 2025, ABDELHAK purchased tickets for ABDELHAK and CHEN to fly from JFK Airport to San Francisco International Airport (“San Francisco Airport”) the next day. ABDELHAK and CHEN were in adjoining seats on the flight from JFK Airport to the San Francisco Airport, and on January 21, 2025, ABDELHAK and CHEN flew on the same flight from

the Los Angeles International Airport to the Sacramento International Airport (“Sacramento Airport”), and then on the same flight from the San Francisco Airport back to JFK Airport.

72. CHEN’s and ABDELHAK’s flight from the San Francisco Airport to JFK Airport landed the following morning, January 22, 2025. That morning, law enforcement observed ABDELHAK and CHEN exit the plane at JFK Airport and walk together in the airport before parting ways. A photograph of CHEN, to the left, and ABDELHAK, to the right, at JFK Airport before separating is set forth below:

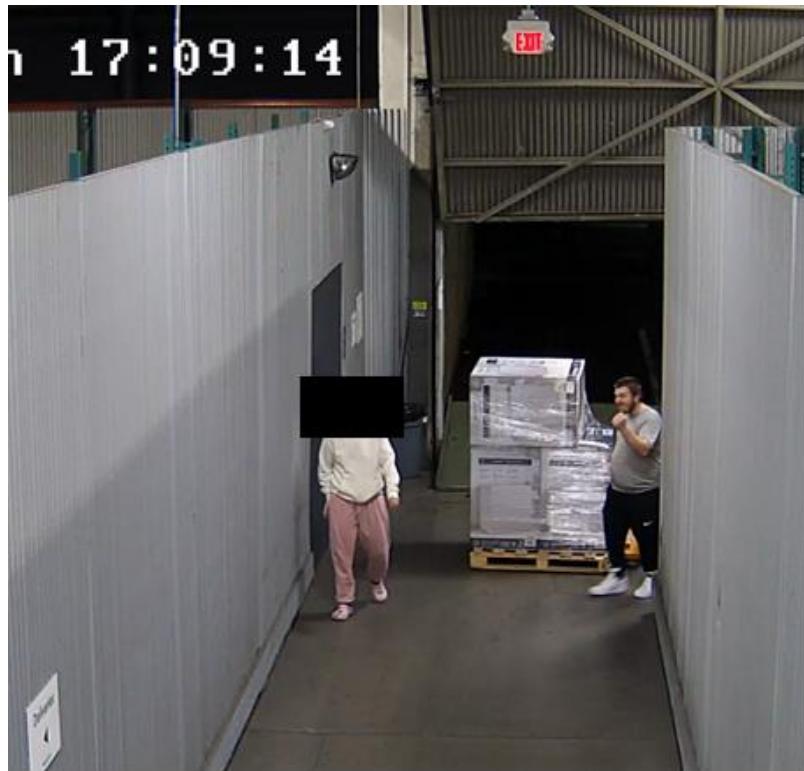


73. ABDELHAK was picked up at the airport by his girlfriend who drove him to his home in Flushing, Queens. CHEN took a rideshare to his apartment in Long Island City, New York.

#### **F. The Seizure of 239 Kilograms of Cocaine and 686 Pounds of Marijuana from DIXON**

74. In December 2024 and January 2025, Nationwide Transport, through CAMPBELL, (i) entered lease-to-own agreements for two trucks, including a used 2024 Freightliner, model PT126SLP, semi-truck (the “Freightliner”), and (ii) leased a trailer for a tractor trailer (together with the Freightliner, “Tractor Trailer II”).

75. On January 27, 2025, CHRISTMAN, DIXON, and CC-3 were together at 5625 Firestone Boulevard. CHRISTMAN and CC-3 were observed pulling a dolly with three boxes of chest freezers, as depicted below:



76. DIXON, in orange below, also pulled the dolly with boxes of chest freezers behind CHRISTMAN and CC-3:



77. Later on January 27, 2025, DIXON was stopped in Arizona by the Arizona State Police driving Tractor Trailer II. Following the stop, DIXON texted CAMPBELL, “Had an hour left of drive time and got pulled over. For the mudflaps .. then he smelled weeed,” “But I went the extra mile of moving them pallets by hand last night .. and putting an empty one on top of each one,” “Only load the bottom ones .. I’ll show what I mean later,” “Me and free threw on the empty on the top of each cuz I had a gut feeling .. then we wrapped them,” to which CAMPBELL responded, “Bro excellent job brother.” Based on my training, experience, and knowledge of the investigation, DIXON advised CAMPBELL of the stop and explained how he and CHRISTMAN, or “[F]ree,” concealed and wrapped the drugs in Tractor Trailer II, which avoided detection by law enforcement. In response, CAMPBELL praised DIXON for hiding the drugs.

78. After leaving Arizona, DIXON’s cellphone travelled to Tulsa, where it remained for approximately six hours on January 30, 2025. SMITH’s cellphone was in the same area of Tulsa at the same time.

79. After leaving Tulsa, DIXON’s cellphone headed towards New York. At 5:55 p.m. on Friday, January 31, 2025, law enforcement observed Tractor Trailer II traveling eastbound on Interstate 76 near Harrisburg, Pennsylvania, and then followed Tractor Trailer II as it drove through New Jersey to the George Washington Bridge without stopping.

80. As DIXON drove towards New York City, he received a text from CHRISTMAN asking, “When you need scout to happen ?” DIXON responded, “Should be fine .. I guess 9[:]:30 if you can,” followed by, “9:45,” and CHRISTMAN replied, “Okay.” At 8:51 p.m., CHRISTMAN texted DIXON, “Checking now be at gw in 20 min,” to which DIXON responded, “Ok,” followed by, “I’m pulling up to gw now.” At 9:10 p.m., CHRISTMAN texted DIXON, “Gw clean,” followed by, “Headed to throg now,” DIXON responded, “Ok,” and CHRISTMAN replied, “Throgs good.” Based on my training, experience, and knowledge of the investigation, CHRISTMAN asked DIXON when he should “scout” for law enforcement on the George Washington Bridge and Throgs Neck Bridge. After traversing the bridges, CHRISTMAN advised DIXON that he did not observe any law enforcement.

81. At approximately 9:34 p.m., law enforcement stopped DIXON driving Tractor Trailer II on the Cross Bronx Expressway between the George Washington Bridge and Throgs Neck Bridge. After moving it off the roadway, law enforcement searched Tractor Trailer II and discovered approximately 239 kilograms of cocaine hidden in chest freezers and approximately 686 pounds of marijuana in unmarked boxes.

82. As depicted below, the boxes for the chest freezers containing the approximately 239 kilograms of cocaine are identical to the boxes of chest freezers pulled by CHRISTMAN, DIXON, and CC-3 at 5625 Firestone Boulevard on January 27, 2025:



83. A photograph of the chest freezers with approximately 239 kilograms of cocaine and black garbage bags containing approximately 686 pounds of marijuana initially located in unmarked boxes is set forth below:



84. A photograph of the cocaine and marijuana found in the chest freezers and boxes is set forth below:



85. Following the stop, DIXON was interviewed, denied knowledge of the cocaine and marijuana, and left at around 12:34 a.m. on February 1, 2025. DIXON claimed, however, that he was sleeping in New Jersey for six or seven hours before entering New York on his way to Queens, which was untrue.

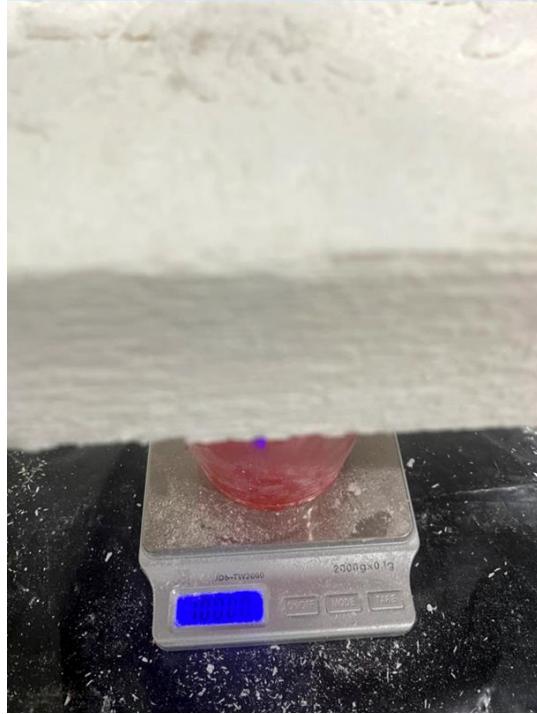
86. Within approximately nine hours of the stop of Tractor Trailer II, there were calls between CAMPBELL's cellphone and DIXON's cellphone; CAMPBELL's cellphone and CHRISTMAN's cellphone; and between CAMPBELL's cellphone and CC-1's cellphone. ABDELHAK's cellphone, CHEN's cellphone, CAMPBELL's cellphone, DIXON's cellphone, and CHRISTMAN's cellphone were all located in the area of Commack, New York, which is on Long Island, between 5:31 a.m. and 6:31 a.m. on February 1, 2025.

87. Based on my training, experience, and knowledge of the investigation, following the seizure of cocaine and marijuana from Tractor Trailer II the evening of January 31, 2025, ABDELHAK, CHEN, CAMPBELL, DIXON, and CHRISTMAN met on Long Island to discuss the seizure of cocaine and marijuana.

### **III. ABDELHAK Coordinating Drug Deliveries**

88. Before CHRISTMAN, Co-Conspirator-4 ("CC-4") and Co-Conspirator-5 ("CC-5"), who were in a relationship and lived in Fulton County, New York, worked as couriers for ABDELHAK.

89. On August 17, 2023, CC-4 texted ABDELHAK the following photograph of what appears to be, based on my training and experience, a kilogram of cocaine on a digital scale:



90. A minute after sending the photograph, CC-4 texted ABDELHAK, “Washing up then we’re out let you know eta,” ABDELHAK responded, “Kinda early to head. Out,” and CC-4 replied, “Heading out at 4.” ABDELHAK explained, “It ain’t gonna take you no 7 hours to get there tho,” CC-4 responded, “Didn’t you say it ok show up little early cause of having to shoot back home after it’s your call you I’ll do you need me to,” and ABDELHAK replied, “I don’t think early works you still gonna have to wait for him up there.” ABDELHAK asked, “Y’all ain’t get no rest ?” to which CC-4 answered, “Yea I crashed we went up after you left I still have to put it in the package and wrap it up to yet.” Based on my training, experience, and knowledge of the investigation, ABDELHAK and CC-4 discussed CC-4 and CC-5 delivering drugs for ABDELHAK. CC-4’s statement, “I still have to put it in the package and wrap it up,” refers to packaging drugs, likely the cocaine in the photograph, for delivery to another person for ABDELHAK.

91. CC-5 and ABDELHAK communicated about, among other things, CC-4 and CC-5 travelling for ABDELHAK, including to meet HARPER. On August 17, 2023, ABDELHAK texted CC-5, “Let me know before you leave,” CC-5 responded, “We had to clean up and the boys scene us anyways then rob came,” and ABDELHAK replied, “So when you heading out,” followed by, “Gonna make it hard to see mizz tonight.” CC-5 answered, “We’ll meet wherever you want us to meet just couldn’t just not see them and washed up,” and ABDELHAK responded, “I get it,” followed by, “Just letting you know.” Later in the exchange, CC-5 asked, “What’s the latest time miz will meet up,” ABDELHAK answered, “He don’t do late night meets,” “Pass by me first,” followed by, “Then go to boots.” Five days later, on August 22, 2023, ABDELHAK texted CC-5, “The plan was you go see Mizz go see your kids and come back and get a uhaul trolley to pull the car back.” Based on my training, experience, and knowledge of the investigation, ABDELHAK and CC-5 discussed CC-4 and CC-5 travelling to meet HARPER, or “[M]iz,” to deliver controlled substances or pick up drug proceeds.

92. On August 22, 2023, ABDELHAK texted CC-5, “Y’all kept a whole pound of ice,” “That wasn’t stealing neither ?” followed by, “I told y’all to keep it ?” Based on my training, experience, and knowledge of the investigation, ABDELHAK referenced CC-4 and CC-5 keeping a pound of methamphetamine, which is often called “ice.”

93. ABDELHAK and CHRISTMAN routinely discussed CHRISTMAN delivering drugs and picking up drug proceeds for ABDELHAK, including to and from HARPER, MEDINA, and HOGUE.

94. For instance, on November 7, 2023, ABDELHAK texted CHRISTMAN, “Hit Miz,” followed approximately half an hour later by, “You spoke ?” CHRISTMAN responded, “Yea.” The next day, November 8, 2023, CHRISTMAN texted ABDELHAK, “He answered we good,” “245,” “Here starting to count,” followed by, “141540,” ABDELHAK responded, “He said 152,” and CHRISTMAN replied, “I’ll re count.” Based on my training, experience, and knowledge of the investigation, ABDELHAK directed CHRISTMAN to contact HARPER and CHRISTMAN advised ABDELHAK that he spoke to HARPER. The next day, CHRISTMAN advised ABDELHAK that HARPER answered the phone, that he was with HARPER, and then that he was counting cash drug proceeds. After CHRISTMAN informed ABDELHAK that HARPER provided \$141,540 in drug proceeds, ABDELHAK explained that HARPER said he provided \$152,000, and CHRISTMAN told ABDELHAK that he would recount the cash.

95. On November 18, 2023, ABDELHAK texted CHRISTMAN, “Whisps>Mizz>Back,” followed by, “That’s your route.” Based on my training, experience, and knowledge of the investigation, ABDELHAK instructed CHRISTMAN to drive to HOGUE, or “Whisps,” and then to HARPER, or “Mizz,” to deliver drugs or pick up drug proceeds, or both, which was CHRISTMAN’s “route” working as a drug courier for ABDELHAK.

96. The next day, November 19, 2023, ABDELHAK texted CHRISTMAN, “You know what the different piles are for,” followed by, “Or no,” CHRISTMAN responded, “44 is girl the other cream,” followed by, “Just got gas I’ll be home 720,” and ABDELHAK replied, “Okay,” followed by, “Once you get home do a detailed total count of everything you have there.” “Girl” refers to cocaine, which is often called “white girl,” and “cream” refers to methamphetamine, which is often called “ice cream,” and based on my training, experience, and knowledge of the investigation, CHRISTMAN informed ABDELHAK that \$44,000 was payment for cocaine and another “pile” of money was payment for methamphetamine. ABDELHAK then instructed CHRISTMAN to conduct a “detailed total count” of all the cash drug proceeds collected by CHRISTMAN.

97. On Friday, December 22, 2023, ABDELHAK texted CHRISTMAN, “Have a talk with tank and miss,” followed by, “Mizz,” CHRISTMAN responded, “About ?” and ABDELHAK replied, “See if they absolutely need them tomorrow or if you can bring them when you go up,” “On Monday right ?” “Tuesday,” followed by, “Ask for yourself.” Based on my training, experience, and knowledge of the investigation, ABDELHAK instructed CHRISTMAN to talk to MEDINA, or “Tank,” and HARPER, or “Mizz,” to determine if they needed drugs, or “them,” the following day, a Saturday, or whether CHRISTMAN could deliver the drugs when he travelled “up” on Tuesday.

98. ABDELHAK also routinely used the Chinese encrypted-messaging application WeChat to discuss drug trafficking and laundering drug proceeds.

99. For instance, on April 13, 2022, ABDELHAK sent WeChat messages to an unknown male (“UM-1”), stating, “I need to send money you have money transfer ?” and UM-1 responded, “Yes,” and then sent a voice message stating, “How many? How many?” ABDELHAK answered, “I need send 100K,” followed by, “10,” UM-1 responded, “ok,” and ABDELHAK asked, “Available ?” UM-1 replied, “yes,” and then sent a voice message stating, “Give me your phone number,” to which ABDELHAK responded, “Okay I am ready.” UM-1 sent ABDELHAK an unintelligible voice message, ABDELHAK responded, “Okay no problem,” sent his phone number, and explained, “I don’t speak Chinese tho.” In response, UM-1 sent a voice message stating, “Okay. [unintelligible] call you.” After ABDELHAK messaged, “Call me better on WeChat,” followed by, “And give me pick up address in Cali,” UM-1 responded, “ok,” and ABDELHAK replied, “What time?” In response, UM-1 sent two voice messages, the first of which was unintelligible and the second stating, “My son call you, call you.” ABDELHAK asked, “What’s the code,” “You make the code,” followed by, “So I know it’s trusted,” UM-1 responded, “6666,” followed by, “code,” and ABDELHAK replied, “Lol,” followed by, “Okay.”

100. Approximately half an hour later, UM-1 asked ABDELHAK, “are you in touch?” ABDELHAK responded, “Yes omw,” and UM-1 replied, “ok,” followed by, “you gave him tell me.” ABDELHAK asked, “Can you give 90 to one friend and 10 to my farm workers,” followed by, “Or one person must take all,” UM-1 responded, “?” and ABDELHAK proceeded to explain, “Split for pick up,” “90 pickup for one person,” followed by, “And hold 10 my farmer come pick up tomorrow.” ABDELHAK then messaged, “Total 103000,” and later in the exchange UM-1 explained, “500 less here is also fine for the travel expenses of the younger brother here,” “99500,” followed by, “Ok ?” to which ABDELHAK responded, “Ok no problem.” UM-1 asked, “when to get it ?” ABDELHAK answered, “Tomorrow ?” followed by, “Too late tonight,” and UM-1 replied, “ok,” followed by, “Tomorrow.”

101. The next day, April 14, 2022, UM-1 sent ABDELHAK a screenshot of WeChat messages in Chinese along with a screenshot of an English translation of one of the Chinese messages stating, in the translation, “boss. Foreigners are missing 230. Talk to him. 1 piece 5 piece is too much. I ordered it in the morning when I changed it.” After ABDELHAK responded, “What you mean ?” “I use money counter,” followed by, “He say it’s short 230?” UM-1 answered, “yes,” and ABDELHAK explained, “Okay take it off the balance I guess,” followed by, “I’m sure it’s not missing but okay no problem,” before asking, “Are you ready for me to send the guy for 90 peice ?” UM-1 responded, “yes,” and after ABDELHAK messaged, “Send address,” UM-1 provided an address on N. Pioneer Road in Walnut, California, which is outside Los Angeles.

102. Less than ten minutes later, ABDELHAK messaged, “1hour 15,” UM-1 responded, “ok,” and ABDELHAK replied, “15 mins,” “What’s the code,” “6464,” followed by, “2 mins.” After responding, “ok,” UM-1 messaged, “9 ?” and ABDELHAK answered, “Yes.” Approximately four minutes later, UM-1 asked, “Arrived ?” ABDELHAK answered, “Yes,” followed by, “Honda or charger,” and UM-1 replied, “ok,” followed by, “gave 9.” A minute later, ABDELHAK asked, “Want me to send other guy or are you busy,” followed by, “For the balance ?” UM-1 answered, “ok,” followed by, “10000-730=9270,” to which ABDELHAK responded, “I send him now ?” followed by, “He be there 9pm.” UM-1 replied, “ok,” and then sent a voice message stating, “Waiting. Waiting.” In response, ABDELHAK sent HOGUE’s phone number

and explained, “This his number.” Approximately an hour later, ABDELHAK explained, “He is there buddy,” to which UM-1 responded, “ok.” Less than five minutes later, ABDELHAK asked, “How long,” to which UM-1 responded, “1min,” followed by, “gave 9270.” ABDELHAK replied, “Thank you.”

103. Based on my training, experience, and knowledge of the investigation, ABDELHAK asked UM-1 to transfer \$100,000 from New York to Los Angeles and UM-1 agreed. In the course of discussing the transfer, ABDELHAK provided UM-1 with his phone number and UM-1 provided ABDELHAK with a code, “6666,” for ABDELHAK to provide in delivering \$100,000 in cash to UM-1’s associate in New York to ensure that ABDELHAK delivered the cash to the right person. At ABDELHAK’s request, UM-1 agreed to provide \$90,000 to one person and \$10,000 to ABDELHAK’s “farmer” in Los Angeles. In writing, “Total 103000,” ABDELHAK advised UM-1 that he delivered \$103,000 to UM-1’s associate in New York, which accounts for UM-1’s fee of 3% for transferring the money from New York to Los Angeles, and at UM-1’s request, ABDELHAK agreed to pay an additional \$500 for “travel expenses,” which brought the amount to be delivered in Los Angeles to \$99,500.

104. The next day, UM-1 informed ABDELHAK that UM-1’s associate advised that ABDELHAK delivered \$230 less cash than required. ABDELHAK denied the shortfall, but after explaining that he used a “money counter” to count the cash, agreed to deduct \$230 from the amount of money to be delivered in Los Angeles. After confirming that he was ready to deliver \$90,000, or “the 90 piece,” UM-1 provided the address in Walnut for the person picking up the \$90,000 to meet the person delivering the cash. ABDELHAK provided a code, “6464,” for the person picking up the cash to provide to the person delivering it, and after ABDELHAK advised that the person picking up the cash was driving a Honda or Charger, UM-1 confirmed that the \$90,000 in cash was delivered by writing “gave 9.”

105. ABDELHAK then asked if UM-1 was ready for the “farmer” to pick up the remaining balance; UM-1 answered in the affirmative; and UM-1 explained that, with the \$500 fee for “travel expenses” and \$230 shortfall in cash delivered by ABDELHAK, UM-1 would deliver \$9,270. ABDELHAK provided HOGUE’s phone number as the number for the person picking up the money and UM-1 confirmed when the \$9,270 was delivered. Within seconds of ABDELHAK messaging UM-1, “I send him now ?” in reference to the “farmer” picking up cash on April 14, 2022, ABDELHAK texted HOGUE the same address on N. Pioneer Way in Walnut sent by UM-1 to ABDELHAK. Less than a minute after ABDELHAK messaged HOGUE’s number to UM-1, ABDELHAK texted HOGUE, “I gave him ya number.” And approximately two minutes before UM-1 messaged ABDELHAK, “gave 9270,” HOGUE texted ABDELHAK, “Do I knock. Wait here,” “All set. She wasn’t sure how much she gave me. I’ll count it after,” followed by, “There’s singles,” ABDELHAK responded, “Ok,” and HOGUE replied, “9,270.”

106. On November 25, 2023, and unidentified male (“UM-2”) messaged ABDELHAK through WeChat, “How much you get for NY prices,” ABDELHAK responded, “How much I sell ?” followed by, “I sell for 17,” and UM-2 replied, “You buy.” ABDELHAK answered, “I don’t buy in NY,” followed by, “I buy there,” UM-2 asked, “How much for NY,” and ABDELHAK proceeded to explain, “For 12,” followed by, “If I buy in NY 14.5 is the most.” UM-2 asked, “LA?” and then messaged, “O ok,” ABDELHAK responded, “Buy in NY is 14.5 they give credit,” UM-2 replied, “For 12 LA,” and ABDELHAK explained, “If I may cash in NY still maybe 13.8,” followed by “Pay\*” UM-2 proclaimed, “Wow,” ABDELHAK explained, “LA if you buy many

pieces it gets cheaper," followed by, "Maybe 11.5," and UM-2 replied, "Okay I see." ABDELHAK then messaged, "Yes I have big guy we do much business," followed by, "Maybe I can sell to your customer here," and UM-2 responded, "Yeah."

107. Based on my training, experience, and knowledge of the investigation, ABDELHAK advised UM-2 that he obtains cocaine in Los Angeles; that he pays \$12,000 per kilogram of cocaine in Los Angeles; and that he sells cocaine for \$17,000 per kilogram in New York City. ABDELHAK also advised UM-2 that if he purchases cocaine in New York, he pays \$14,500 per kilogram on credit, but that if he pays for the cocaine upfront, a kilogram of cocaine may cost \$13,800. At the end of the conversation, ABDELHAK explained that if you purchase a large quantity of cocaine in Los Angeles the price is lower; that he obtains cocaine from a large-scale cocaine trafficker or "big guy" in Los Angeles and does "much business" with the trafficker; and ABDELHAK offered to sell cocaine to UM-2's customer in New York.

#### **IV. CHEN Coordinating Drug Deals with CC-2 and CASTRO-SANCHEZ**

108. On a regular basis, CHEN instructed CC-2 to deliver drugs to customers in the area of New York City.

109. For instance, on October 12, 2024, CC-2 messaged CHEN through Signal, "Do I know Jon p?" CHEN answered, "Nah," "Ariel does," "Looking for 1 c, 1 k," followed by, "643 Washington Avenue," CC-2 responded, "In Brooklyn is 33 min," "10 min," "Here," followed by, "Done," and CHEN replied, "Pull up hq," followed by, "We here man." Based on my training, experience, and knowledge of the investigation, CC-2 asked CHEN if he knew a drug customer named "John p"; CHEN answered in the negative, but explained that "Ariel," i.e., CASTRO-SANCHEZ, does; and CHEN instructed CC-2 to deliver one gram of cocaine, or "c," and one gram of ketamine, or "k," to the customer at a particular address. After CC-2 advised CHEN that he delivered the cocaine and ketamine, CHEN instructed CC-2 to go to "hq," i.e., 145-38 134th Avenue.

110. In the early-morning hours of November 22, 2024, CC-2 sent CHEN the following Signal message:

11/21  
 - [x] Pick up from 34th  
 - [ ] Mail out 2x GB41 2x g45-80  
 - [ ] Mail out bag of k  
 - [ ] Drop off purple M to Rome  
 - [x] 114k flushing meet 8:15pm \$2042 collected  
 - [x] 55 water by 5:45 3c collected 300  
 - [x] 1 whole thing of K 500 m @ 15415 roosevelt ave flushing 8:20 pm\$3500 collected  
 - [x] 195 Macon st, 20 tabs \$240 collected  
 - [x] Can I get a g of k to 346 w 36th st \$100 collected  
 - [x] 430 W 34th st just one g coke - when should I be ready? \$100 collected  
 - [x] Wondering if I could please get an order to my place in Ridgewood 1926 Himrod St apt  
 1L 2k \$200 Zelle don Eladio

CHEN responded, “Ok bet just leave all bread,” followed by, “Well deduct out of digital,” and CC-2 replied, “Heard.”

111. Based on my training, experience, and knowledge of the investigation, CC-2 sent CHEN the initial message to advise CHEN of drugs delivered and payment for drugs collected the previous day, including a “whole thing” of ketamine delivered and \$3,500 collected, and one gram of cocaine, or “coke,” delivered and \$100 collected. In response, CHEN instructed CC-2 to leave the cash drug proceeds, which would be deducted from “digital” payments for drugs and “digital” money owed by CC-2 to CHEN.

112. CHEN and CC-2 also discussed CC-2 delivering drugs to MEDINA and HARPER in Central and Western New York.

113. For instance, in the early-morning hours of October 17, 2024, CHEN messaged CC-2 through Signal, “I got a move to binghamtom tomorrow for 500 you want it? Its a 3 hour ride, ariel was suppose do it b ur he works,” CC-2 responded, “Time?” and CHEN proceeded to explain, “Usually early, text the groupchat that you can leave around 10-10:30 am,” “And hell give details and address,” “Itll be 5 or 6 of the things inside long island pickup,” “Just pack it nice,” “And then you can call it a day from there if you want,” followed by, “You should be home by like 5 from upstate.” At 8:26 a.m. the same day, CC-2 asked CHEN, “Should I heave black bag at my house?” followed by, “So I’m not going up and down with it at HQ.” At 4:02 p.m., CHEN messaged CC-2, “How u feelin pa,” followed by, “U bouta meet gervontis tank bro.” CC-2 immediately responded, “Lmao I just I did,” “Im going to the mall rn,” followed by, “They are all the same right,” CHEN asked, “Wym?” followed by, “The t shirts?” and after CC-2 missed a Signal call from CHEN, CC-2 responded, “Yea it’s bird right,” followed by, “Ariel is the one who packed the bag.”

114. Based on my training, experience, and knowledge of the investigation, CHEN asked CC-2 if he wanted to deliver drugs to Binghamton, New York, the following day for \$500, and instructed CC-2 to message a group chat for the address and other details. After CHEN explained that CASTRO-SANCHEZ, or “Ariel,” was supposed to deliver the drugs and that the drugs would consist of “5 or 6 of the things inside long island pickup,” CHEN advised CC-2 that he was about to meet MEDINA, whom he referred to as “gervontis tank.” CC-2 then informed CHEN that he met MEDINA, and asked about the drugs, which were packed by CASTRO-SANCHEZ.

115. At 10:14 p.m. on October 23, 2024, CHEN messaged CC-2 through Signal, “56 Davis st Rochester ny,” followed by, “Have to be there by 12 PM tomorrow,” CC-2 responded, “Heard,” and CHEN replied, “Two big bags in HQ ill leave by the door.” After CC-2 responded, “Heard,” CHEN explained, “Or if ure free tonight,” followed by, “I can pass to ariel,” and CC-2 replied, “I’ll grab from hq.” CHEN answered, “Ok,” sent an unavailable photo, and explained, “These two bags, don’t bring anything else,” CC-2 responded, “I’ll be there 5:30am,” and CHEN replied, “Drive red hyundai so u have a trunk,” “The taller bag has wheels,” followed by, “that can roll.” CC-2 answered, “Heard,” to which CHEN responded, “You’ll be seeing tank’s boy mizz,” followed by, “Ill groupchat later.” CC-2 asked, “Im collecting bread?” followed by, “Is he busting moves while I wait?” CHEN answered, “We don’t know yet he’s supposed to lmk tonight,” “But i’m going to assume yeah,” “So just hit the gny up there or something,” “Go to the spa,” followed by, “Get a nice massage,” and at 5:43 a.m. on October 24, 2024, CC-2 messaged CHEN, “Im 24

min from hq.” CHEN responded, “Ok u think the teo bags will fit,” followed by, “in ur trunk,” and CC-2 replied, “Yuh.”

116. At 8:21 a.m. on October 24, 2024, CC-2 messaged CHEN, “These n\*\*\*\*s sent me to another country,” followed by, “Lmao,” and at 1:38 p.m., CHEN asked, “U in [C]anada.” At 1:39 p.m., CC-2 messaged, “N\*\*\*a got me in India,” “Im here though,” followed by, “Waiting for ol boy to bring the bread.” Approximately six hours later, CC-2 advised CHEN, “1am arrival at HQ. I’m not bringing any bread back. He’s giving you a call now,” CHEN responded, “Damn i wish he let us know earlier,” followed by, “Would of just had you come back,” and CC-2 replied, “It’s okay,” followed by, “Name of the game.” At 7:21 p.m., CHEN messaged CC-2, “I got 700 for you tomorrow,” CC-2 responded, “You ain’t make bread today tho,” and CHEN replied, “Thats business.” Approximately an hour later, at 8:26 p.m., CHEN asked, “Did he give anything back,” CC-2 answered, “Yeah both bags minus the samples,” and CHEN replied, “Fuck man.”

117. Based on my training, experience, and knowledge of the investigation, CHEN had CC-2 deliver drugs to MEDINA’s associate HARPER, i.e., “tank’s boy mizz,” at 56 Davis Street, Rochester, New York. The drugs were in two bags with wheels at 145-38 134th Avenue, which CC-2 picked up and delivered to Rochester. Upon arriving in Rochester, CC-2 advised CHEN, and HARPER ultimately did not provide payment for drugs to CC-2. Instead, HARPER kept two “samples” of drugs and sent CC-2 back to New York City with the bags. Despite not collecting money from HARPER, CHEN advised CC-2 he would be paid \$700 for the trip to Rochester.

118. On November 15, 2024, CHEN messaged CC-2 through Signal, “U eotking tm?” CC-2 answered, “Negative,” followed by, “Im working sat and sun,” and CHEN replied, “Bet money team.” CC-2 asked, “Where’s tank,” “When you coming back,” followed by, “The streets are calling for you,” CHEN answered, “I’m not,” and CC-2 replied, “Oh shit.” CHEN then explained, “I got you and ariel in the city and tank upstate,” and CC-2 responded, “Ariel running this over here?” CHEN then messaged, “Looking for that member in cali now,” followed by, “I got boot in okc,” and CC-2 replied, “Boots on the ground.” CHEN messaged, “Next is atlanta and florida,” CC-2 responded, “Put me in Canada,” and CHEN replied, “And eventually london.”

119. Based on my training, experience, and knowledge of the investigation, CHEN asked CC-2 if he was working delivering drugs the following day and CC-2 explained that he was working on Saturday and Sunday. After CC-2 asked when CHEN was returning to New York City, CHEN explained that CC-2 and CASTRO-SANCHEZ, i.e., “[A]riel,” were working for CHEN dealing drugs in New York City and MEDINA, or “[T]ank,” was working dealing drugs for CHEN “[U]pstate.” CHEN observed that he was looking to expand his organization to California, or “[C]ali,” Atlanta, Florida, and eventually London, and noted that he has SMITH, i.e., “[B]oot,” working for him in Oklahoma City or “okc.”

120. CC-2 also routinely communicated with CASTRO-SANCHEZ about drug trafficking.

121. For instance, on October 13, 2024, CASTRO-SANCHEZ messaged CC-2 through Signal, “Any orders ?” CC-2 answered, “Did you tell him you’re done?” followed by, “Nothing as of yet, I’m heading to hq now to re-up,” and CASTRO-SANCHEZ replied, “Ok,” “Yeah tell him To send you orders,” followed by, “I’m not working today.” Based on my training, experience, and knowledge of the investigation, CASTRO-SANCHEZ asked CC-2 if there were any drug

orders; CC-2 asked CASTRO-SANCHEZ if he told CHEN he was no longer working dealing drugs that day and explained that there were no orders yet but that he was going to “hq,” i.e., 145-38 134th Avenue, to obtain more drugs for sale or “re-up”; and CASTRO-SANCHEZ explained that he was not working and to tell CHEN to send drug orders to CC-2.

122. On November 9, 2024, CASTRO-SANCHEZ sent CC-2 a link to an Apple Map’s pin at an address on Water Street in Manhattan and CC-2 responded, “What is that.” CASTRO-SANCHEZ answered, “I’ll call you soon,” followed by, “That’s a move,” and CC-2 replied, “Ok.” CASTRO-SANCHEZ explained, “I’ll give you 25,” followed by, “Ima meet up with you and give you stuff,” CC-2 responded, “If i don’t have any moves I’ll do it,” and CASTRO-SANCHEZ replied, “At hq bagging stuff,” followed by, “You gonna collect 770.” After CC-2 messaged, “I thought it was a personal move,” followed by, “Like 1 of your clients lol,” CASTRO-SANCHEZ explained, “No it’s mine and Leon’s,” followed by, “New client,” CC-2 responded, “Heard,” and CASTRO-SANCHEZ replied, “He’s working for us at the clubs.” Based on my training, experience, and knowledge of the investigation, CASTRO-SANCHEZ sent CC-2 an address at which to deliver drugs and then explained that he would deliver the drugs to CC-2. After CASTRO-SANCHEZ advised CC-2 that he was at “hq,” i.e., 145-38 134th Avenue, packaging drugs, CASTRO-SANCHEZ explained that CC-2 would pick up \$770 from the drug customer; that the “client” was a customer of CASTRO-SANCHEZ and CHEN; and that the “client” was selling drugs at “clubs” for CASTRO-SANCHEZ and CHEN.

123. At 9:17 a.m. on November 17, 2024, CC-2 texted CASTRO-SANCHEZ, “Yo you up?” followed by, “Might need 100g of C delivered,” CASTRO-SANCHEZ responded, “No,” “But they will be alright,” “What time is it at,” followed by, “Now I’m a little up,” and CC-2 replied, “Call Leon.” CASTRO-SANCHEZ explained, “Yeah he hasn’t answered,” CC-2 answered, “Hmmm,” “Can you cover me until 5 please,” followed by, “I’ll send another 25,” and CASTRO-SANCHEZ replied, “I’m dead rn,” followed by, “I got you.” Based on my training, experience, and knowledge of the investigation, CC-2 asked CASTRO-SANCHEZ if he was awake and explained that he may need 100 grams of cocaine delivered. CASTRO-SANCHEZ initially refused to deliver the cocaine, but ultimately agreed to cover CC-2’s shift delivering drugs for CHEN, whom CC-2 told CASTRO-SANCHEZ to call.

## **V. The Stash Houses in Niskayuna and Farmington, New York**

124. On December 21, 2023, law enforcement executed a search warrant at an apartment in Niskayuna, New York (“Niskayuna Apartment”). In searching the Niskayuna Apartment, law enforcement observed that the apartment did not contain any furniture and discovered, among other items, (i) at least four (4) empty clear vacuum-sealed plastic bags wrapped in cellophane containing a total of approximately 0.93 grams of cocaine; (ii) a Pyrex measuring cup containing a white-chunky substance that tested positive for cocaine, and (iii) new vacuum-seal plastic bags, rubber bands, and nitrile gloves.

125. Law enforcement also discovered a receipt bearing CHAQUILL FOSTER’s name and phone number and video footage depicts CHAQUILL FOSTER entering the Niskayuna Apartment on December 6, 2023. The Niskayuna Apartment was rented using a stolen identity and fake driver’s license; in April, June, and September 2023, rent for the Niskayuna Apartment was paid from CHAQUILL FOSTER’s bank account.

126. Based on my training, experience, and knowledge of the investigation, the vacuum-sealed plastic bags wrapped in cellophane are consistent with wrappers for kilograms of cocaine, and the Pyrex cup with a white-powder residue is consistent with a measuring cup used to “cook” cocaine into cocaine base or “crack.” Moreover, vacuum-seal plastic bags, rubber bands, and nitrile gloves are all used to prepare cocaine and other drugs for distribution. The absence of furniture in the Niskayuna Apartment, in conjunction with the drug-packaging materials, indicates that the apartment was used as a “stash house,” which is a location used by drug traffickers to store and package drugs. The use of a “stash house,” as opposed to storing drugs in an occupied residence, enables traffickers to distance themselves from drugs.

127. On July 10, 2024, law enforcement executed a search warrant at an apartment in Farmington, New York (“Farmington Apartment”). In searching the Farmington Apartment, which besides a bed was unfurnished, law enforcement discovered (i) a vacuum sealed bag with two kilograms of cocaine in a bedroom closet, (ii) a blue reusable shopping bag with \$119,600 in cash in a utility closet, (iii) \$40,623 in cash in a kitchen cabinet, (iv) \$20,000 in cash in the bedroom, (v) drug packaging materials, a vacuum sealer, and a money counter on the kitchen table, (vi) a digital scale with a white-chunky substance in its tray in the kitchen drawer, and (vii) a magazine with five .380 caliber rounds on a bedroom dresser along with a Southwest Airlines luggage tag for luggage carried by HARPER on a flight from Los Angeles to Buffalo, New York on May 5, 2024. MEDINA’s fingerprints were recovered from the money counter and a soap box in the Farmington Apartment.

128. The Farmington Apartment was rented in April 2024 using a stolen identity and fake driver’s license. The same stolen identity and fake driver’s license was used by ABDELHAK in May 2024 to rent an apartment in Long Island City.

## **VI. HARPER and MEDINA Supplying CC-5 with Cocaine in Syracuse**

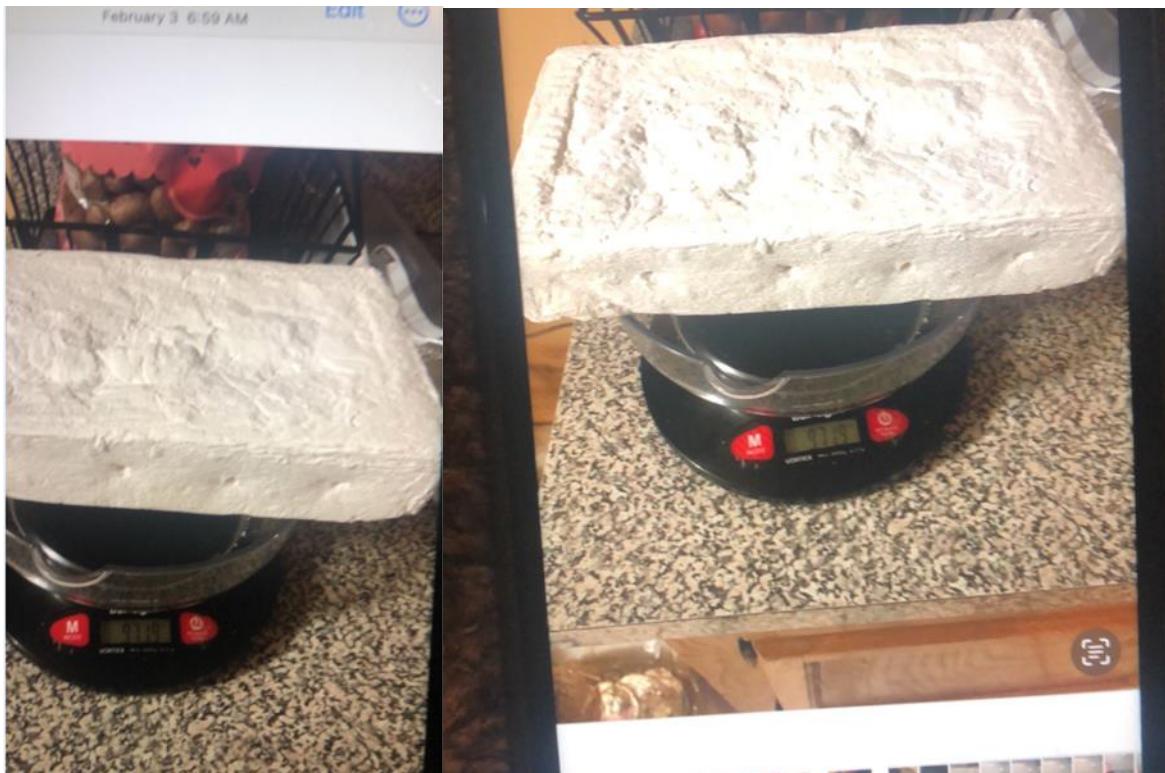
129. HARPER and MEDINA routinely supplied Co-Conspirator-5 (“CC-5”) with multi-kilogram quantities of cocaine for distribution in Syracuse, New York, and discussed cocaine trafficking through Signal and text messages.

130. For instance, on March 7, 2024, CC-5 messaged MEDINA, “Tell that n\*\*\*a mizz I’m feeling some type of way,” “He don’t answer my phone I just be wanting to talk,” followed by, “Least u answer for ur unk man,” MEDINA responded but content of the message is not available, and CC-5 replied, “If that n\*\*\*a don’t answer me ima put itching powder on the money.” MEDINA then explained, “He lost his phone.” Based on my training, experience, and knowledge of the investigation, CC-5 expressed his frustration with HARPER, or “[M]izz,” not answering and joked that he would put “itching powder” on cash payments for drugs, and MEDINA advised CC-5 that HARPER lost his phone.

131. On March 15, 2024, CC-5 sent MEDINA a video of what based on my training, experience, and knowledge of the investigation is approximately one kilogram of cocaine on a digital scale and empty kilogram wrappers, a screenshot of which is set forth below:



132. On May 10, 2024, CC-5 sent MEDINA four photographs of what, based on my training, experience, and knowledge of the investigation, depict approximately one kilogram of cocaine on a digital scale, then messaged, "You deleted this message," followed by another photograph of a kilogram of cocaine on a digital scale, and then messaged, "Had picks of me in it lol," followed by, "Can't have that." Two of the five photographs are set forth below:



133. MEDINA responded, “Any with the stamp,” followed by, “On it,” CC-5 answered, “Just the wrappers,” and MEDINA replied, “Send em.” CC-5 messaged, “I did,” MEDINA explained, “So we know what ones,” and CC-5 responded, “Seen the green wrapper,” “They were the soft ones,” “So I could not flip an flop them,” followed by, “That’s all the pics I have of them.” CC-5 then sent MEDINA the following two photographs of what, based on my training, experience, and knowledge of the investigation, depict wrappers for kilograms of cocaine:



134. Based on my training, experience, and knowledge of the investigation, MEDINA asked CC-5 if CC-5 had photographs of a kilogram depicting the “stamp” so MEDINA would know which kilograms were inadequate. CC-5 explained that the kilograms with a green wrapper were “soft,” and then sent MEDINA photographs of wrappers for kilograms of cocaine, including a green wrapper with yellow tape.

135. On May 20, 2024, CC-5 sent the following messages through Signal to MEDINA: “Yo neph,” “I have enough today I buy the 5 y’all got,” “So we can wash that and then y’all can come down at the end of the week an I should be able to have most of ur bread on what I owe y’ all,” “Once ur paid ima take my time an break mine down,” “Have Miz hit me in here so we can all talk tho … is there any way I can get them for 15500,” “Jc an all this n\*\*\*as down here for the same work they moving maybe 5 a months I doing 30,” “An they getting it same price is me,” “That’s not right,” “I’m doing number once I’m done with these ones when u give me these next 5 I did 37 this month,” followed by, “By myself.” Later in the day, CC-5 missed two voice calls over Signal from MEDINA, followed by another missed call over Signal from MEDINA on May 21, 2024.

136. Based on my training, experience, and knowledge of the investigation, CC-5 advised MEDINA that he had the money to purchase five kilograms of cocaine from MEDINA and HARPER and would have the remainder of his outstanding debt by the end of the week. CC-5 then asked MEDINA to have HARPER, or “Miz,” contact him to discuss lowering the price per kilogram of cocaine to \$15,500 and explained that other cocaine traffickers who only purchase five kilograms a month pay the same price as CC-5, who will have purchased 37 kilograms in a month, which is unfair.

137. On June 23, 2024, CC-5 texted HARPER, “Bro I’m dieing. Downhee,” followed by, “Here.” Five days later, on June 28, 2024, CC-5 texted HARPER, “Bro bro,” “Can u just keep it real,” followed by, “Is not these weekend either right,” HARPER responded, “Yes,” “We will be good in the next few days relax,” “Focus,” followed by, “Enjoy ya las few days bored,” and CC-5 replied, “Ok love u.” Two days later, on June 30, 2024, CC-5 texted HARPER, “What the word tho bro bro,” HARPER responded, “Jus landed,” followed by, “I’m here,” and CC-5 replied, “Good my n\*\*\*a,” followed by, “So we good today.” HARPER answered, “I got mid shi to organize if not today Tom we rolling,” to which CC-5 responded, “Ok ok.” Two and a half hours later, CC-5 texted HARPER, “No way to get them today?” followed by, “Yo,” HARPER responded, “Nah,” followed by, “On the road,” and CC-5 replied, “So they not here yet?” followed by, “Def tomorrow ?” At 12:59 a.m. July 2, 2024, CC-5 texted HARPER, “Bro he playing with us now,” followed at 3:10 p.m. by, “What’s good how we looking what I’m doing,” HARPER responded, “Ton jus be ready,” and CC-5 replied, “Do you want me to leave or go down there,” “ETA,” “?” “Call me right back asap,” “Be there in 35,” followed by, “Please don’t make me drive for nothing bro.”

138. Based on my training, experience, and knowledge of the investigation, CC-5 and HARPER discussed HARPER obtaining cocaine to supply to CC-5 with CC-5 repeatedly asking when the cocaine would be available and HARPER ultimately instructing CC-5 to be ready to receive the cocaine the night of July 2, 2024.

139. On July 7, 2024, CC-5 messaged HARPER through Signal, “Yo meet tomorrow,” followed by, “Ima but the 2 an pay u all most all the way off,” then there was a call between CC-5 and HARPER. The next day, July 8, 2024, there were three missed calls between CC-5 and HARPER and then CC-5 messaged HARPER, “Call me I need those 2.” After a missed call between CC-5 and HARPER, CC-5 messaged, “I got enough to buy those 2 and 60 on what I owe you,” and then there were three more calls between CC-5 and HARPER. Later in the day, HARPER provided CC-5 an address in Rochester and asked CC-5, “You close.” Based on my training, experience, and knowledge of the investigation, CC-5 advised HARPER that he required two kilograms of cocaine and that he would pay HARPER \$60,000 from his debt to HARPER for previously supplied cocaine. HARPER then directed CC-5 to an address in Rochester to pick up the cocaine and deliver payment.

## **VII. The Cocaine Shipments to and Controlled Purchases of Cocaine from HOGUE**

140. In July and August 2024, law enforcement conducted three controlled purchases of cocaine from HOGUE in Lake Placid. In total, HOGUE sold approximately 68 grams of cocaine for \$3,000.

141. CHRISTMAN was repeatedly surveilled travelling to and meeting with HOGUE and Co-Conspirator-6 (“CC-6”) in Lake Placid, including at HOGUE’s trailer in a trailer park. CHRISTMAN and SMITH also both met HOGUE at a casino in Schenectady (“Schenectady Casino”).

142. At 8:41 p.m. on February 5, 2024, CHRISTMAN drove into HOGUE’s trailer park in Lake Placid and departed less than five minutes later.

143. At 7:48 p.m. the same day, CC-6 texted HOGUE, “Let me know when he’s close I’m sleeping on the couch,” to which HOGUE responded, “He said 8:30,” followed by, “He’s always been kinda punctual,” and CC-6 replied, “K.” At 8:39 p.m., nearly the same time CHRISTMAN entered the trailer park, HOGUE texted CC-6, “He’s at the door,” followed at 8:41 p.m. by, “All I’m doing is sitting here losing fuckin money anyway,” to which CC-6 responded, “Well there’s a fucking brick sitting on your dresser you can make it up.” Based on my training, experience, and knowledge of the investigation, CC-6 asked HOGUE when CHRISTMAN would arrive to deliver cocaine; HOGUE said at 8:30 p.m.; and when CHRISTMAN arrived at HOGUE’s trailer, HOGUE informed CC-6. A “brick” refers to a kilogram of cocaine, and CC-6’s final text refers to a kilogram of cocaine delivered by CHRISTMAN to CC-6, which was on HOGUE’s dresser.

144. The next day, February 6, 2025, CHRISTMAN’s Honda CRV arrived at HOGUE’s trailer at 7:01 p.m. A man consistent in appearance to CHRISTMAN got out of the Honda CRV, retrieved an unidentified item from the rear passenger seat, and met CC-6 at the front door of HOGUE’s trailer. The male met with CC-6, who was observed holding an unidentified item, for less than one minute and then departed in the Honda CRV.

145. At 2:15 p.m. the same day, HOGUE texted CC-6 a screenshot of messages with CHRISTMAN stating, “730,” and “I’m really sorry brother,” followed by, “Thank you,” in response. In response to the screenshot, CC-6 texted, “Today!?,” and HOGUE replied, “lol.” At 6:51 p.m., HOGUE texted CC-6, “7:07 he said he will be there,” followed at 7:01 p.m.—the same time the Honda CRV arrived at HOGUE’s trailer—“He’s there now.” Five minutes later, CC-6 texted HOGUE, “This one is mildly more solid smells better,” “Still not normal,” followed by, “K imma break it up,” HOGUE responded, “I think something’s really wrong w the system,” and CC-6 replied, “Well those two are ready,” “It’s shinier,” followed by, “Don’t go messaging anyone till you look at it.” HOGUE then texted CC-6, “So dumb,” followed by, “Why would they do it a third fuckin time,” to which CC-6 responded, “He didn’t even know what the fuck is in that shit. He said that one better be right like he had no fucking clue,” followed by, “It is better it’s just not normal.”

146. Based on my training, experience, and knowledge of the investigation, HOGUE advised CC-6 when CHRISTMAN would arrive to deliver cocaine and then advised CC-6 when CHRISTMAN arrived. After CHRISTMAN delivered the cocaine, CC-6 informed HOGUE that the cocaine delivered by CHRISTMAN was better quality than the cocaine delivered the day before, but still not normal, and that she would break the cocaine up into smaller quantities for distribution. After HOGUE observed that there is something wrong with the organization’s cocaine supply, CC-6 informed HOGUE that she prepared two kilograms of cocaine for distribution, that the cocaine is “shinier” than the cocaine delivered a day earlier, and to not contact anyone about the cocaine delivered that day until he observed it. CC-6 then advised HOGUE that CHRISTMAN was unaware what was in the cocaine and reiterated that the cocaine delivered that day was better but not normal.

147. On February 27, 2024, CHRISTMAN’s Honda CRV drove to HOGUE’s trailer, arrived at 7:54 p.m., and departed two minutes later.

148. At 7:49 p.m. the same day, HOGUE texted CC-6, “I haven’t got any messages,” “From anyone yet,” “But he’s pretty punctual usually,” followed by, “I messaged,” to which CC-

6 responded, "I hope he is tonight." At 7:55 p.m., HOGUE texted CC-6, "He's there," and two minutes later, CC-6 responded, "Didn't even make him take off his shoes," "He's been driving 12 hours already now," and HOGUE replied, "Damnnnn." After a discussion of how "tired" the man appeared, HOGUE texted CC-6, "Thank you for taking care of all that," CC-6 responded, "Super quick I said hey how are ya he sighed said hey I said here I'll make it easy don't even take your shoes off he goes uhh thank you," "Swapped bags told me how long he had driven I said drive safely," followed by, "Less than a min thank you good sir," and HOGUE replied, "Now you can at least relax more?" Based on my training, experience, and knowledge of the investigation, HOGUE and CC-6 discussed the time CHRISTMAN would arrive to deliver cocaine, and HOGUE advised CC-6 when CHRISTMAN arrived. CC-6 then recounted that CHRISTMAN had driven for 12 hours, was very tired, and that CHRISTMAN gave her cocaine, she gave CHRISTMAN money, and CHRISTMAN departed in less than a minute.

149. At 10:47 a.m. on April 16, 2024, the Honda CRV departed 69-34 184th Street and drove to HOGUE's trailer, arriving at 4:08 p.m. At 4:11 p.m., CHRISTMAN gave a package to HOGUE and departed in the Honda CRV three minutes later. The Honda CRV then drove back to 69-34 184th Street, arriving at 9:10 p.m.

150. At 9:29 a.m. the same day, HOGUE texted CC-6 a screenshot of messages with ABDELHAK. In the screenshot, HOGUE texted ABDELHAK, "When can he be here," followed by, "Just lmk so I can have everything together," ABDELHAK responded, "What time you want him there," and HOGUE replied, "Whenever is easier for you really. Just not too late at night." ABDELHAK then texted, "He on the way." In response to the screenshot, CC-6 texted HOGUE, "Puts him here at three." Based on my training, experience, and knowledge of the investigation, HOGUE asked ABDELHAK when CHRISTMAN could arrive to deliver cocaine or pick up payment for cocaine, or both, and explained that he needed to know so he could get money together to deliver to CHRISTMAN; ABDELHAK asked when HOGUE wanted CHRISTMAN to arrive; and HOGUE explained that he did not have a preference, but not late at night. After ABDELHAK advised HOGUE that CHRISTMAN departed, HOGUE sent the screenshot to CC-6, who observed that CHRISTMAN would arrive at 3:00 p.m.

151. At 12:11 p.m. on September 15, 2024, CHRISTMAN pulled the Honda CRV into the driveway of 69-34 184th Street. SMITH and two men exited 69-34 184th Street and one of the men placed an unidentified item into the trunk of the Honda CRV. CHRISTMAN entered 69-34 184th Street, returned with an item that he also placed in the trunk of the Honda CRV, and at 12:30 p.m., CHRISTMAN, SMITH, and the two men departed in the Honda CRV. At 3:52 p.m., the Honda CRV arrived in the area of CHRISTMAN's then-residence in Amsterdam, New York.

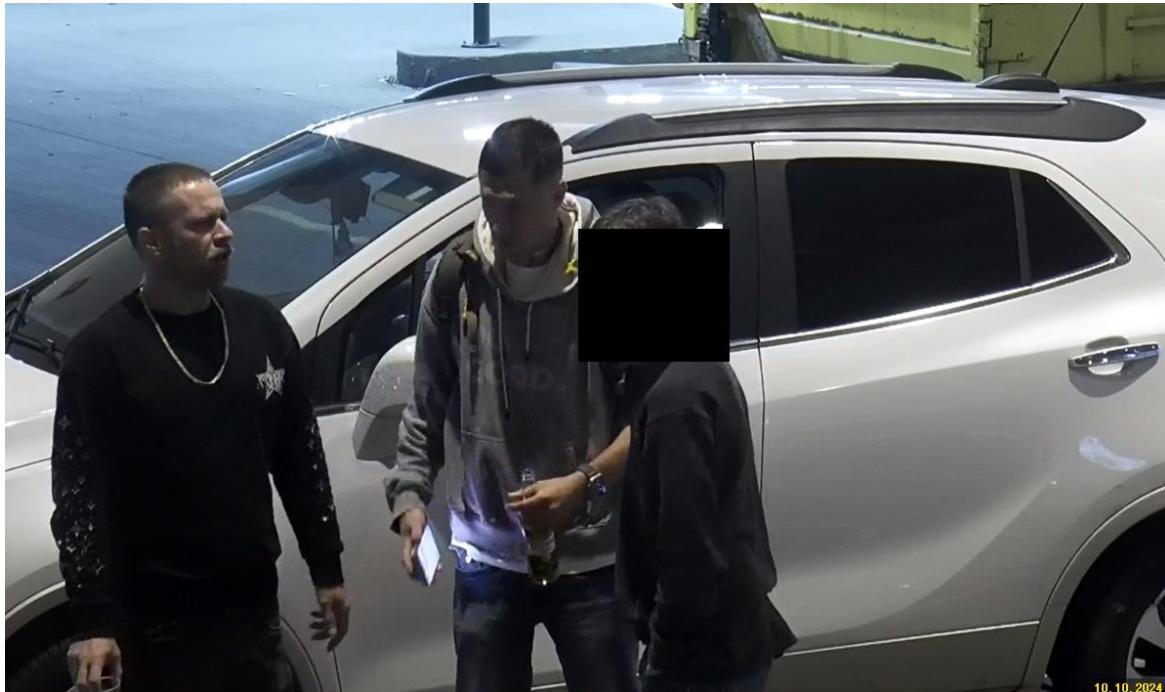
152. At 4:34 p.m. the same day, the Honda CRV arrived at the Schenectady Casino and parked in the parking lot. A minute later, HOGUE, who arrived at Schenectady Casino earlier in the day, met with a man in the lobby. HOGUE and the man then entered a hotel room, which HOGUE was in earlier in the day, and exited a minute later. At 4:39 p.m., HOGUE and the man walked up to the Honda CRV and HOGUE handed CHRISTMAN, who was in the driver's seat of the Honda CRV, a brown lunch pail through the window. CHRISTMAN then drove off in the Honda CRV and HOGUE and the man then reentered the casino.

153. Similarly, on November 25, 2024, HOGUE and Co-Conspirator-7 ("CC-7") arrived together at the Schenectady Casino, checked in, and entered the same hotel room at 5:05 p.m.

Approximately five hours later, CHRISTMAN arrived at the Schenectady Casino in the Chrysler Van and met HOGUE in the lobby at 10:14 p.m. CHRISTMAN and HOGUE then walked to the hotel room, HOGUE opened the door, and HOGUE and CHRISTMAN entered the room, where they remained for approximately two minutes. When CHRISTMAN entered the room, there was nothing in the front pocket of his hooded sweatshirt; after he walked out of the room, there was a large rectangular bulge, consistent in shape to stacks of cash, in his front pocket. CHRISTMAN and HOGUE walked back to the lobby, parted ways at 10:20 p.m., and CHRISTMAN departed in the Chrysler Van.

154. Based on my training, experience, and knowledge of the investigation, HOGUE's brief meetings with CHRISTMAN at the Schenectady Casino are consistent with HOGUE delivering payment for cocaine to CHRISTMAN.

155. In the meantime, on October 10, 2024, HOGUE met SMITH at the Schenectady Casino. HOGUE went into a hotel room with SMITH, and when they exited, HOGUE was wearing a backpack. SMITH and HOGUE walked to a car in the garage, where SMITH passed HOGUE's backpack to a woman in the backseat. After rolling up the window, the woman rolled down the window less than a minute later and handed the backpack to HOGUE, who walked back to the casino alone after speaking with SMITH and another man. A photograph of SMITH, to the left, and HOGUE, to the right, outside the car after the woman returned the backpack to HOGUE is set forth below:



156. Based on my training, experience, and knowledge of the investigation, HOGUE's meeting with SMITH at the Schenectady Casino, in conjunction with SMITH passing HOGUE's backpack to the woman in the back of the car, is consistent with SMITH delivering cocaine to HOGUE.

### **VIII. ABDELHAK's and HOUGE's Marijuana Grow in California**

157. In 2021 and 2022, ABDELHAK and HOGUE invested in and ran a large-scale commercial marijuana grow in California, and routinely communicated about the marijuana grow.

158. For instance, on September 7, 2021, HOGUE texted another person, “New chapters. Got a offer to run a grow op making more than 500k next year. So I retired from the state and I’m gonna make that move. It’s new and exciting,” which based on my training, experience, and knowledge of the investigation, refers to HOGUE being offered a position running a marijuana “grow op[eration]” earning over \$500,000 the next year, which he retired from his state job to take.

159. On March 15, 2022, ABDELHAK sent the following text to HOGUE:

Semi - 40K houses  
 PowerSI - 5850  
 Global Sun - 800  
 Grow Generation - 1193  
 Airbnb 3532  
 Flora Flex - 5241  
 Joel / Kyle - 4500  
 Flights for workers 1500 (est)  
 First month landlord payment 8K ( send monday)  
 Hydroponics 502

Total - 71,118

Whispers  
 25K - Employee payments  
 49.3K - Global Sun  
 1500 - reimburse travel  
 1000 - John water pumps

Total 76,800

Dee  
 20,500 – plants

Based on my training, experience, and knowledge of the investigation, the text summarizes \$71,118 in payments related to the marijuana grow by ABDELHAK (i.e., “Semi”), \$76,800 by HOGUE (i.e., “Whispers”), and \$20,500 paid by “Dee” for marijuana plants.

160. Approximately a month later, on April 11, 2022, HOGUE texted another person, “I’m in Cali,” followed by, “Bought a weed farm,” which based on my training, experience, and knowledge of the investigation, refers to HOGUE purchasing a marijuana farm in California with ABDELHAK.

161. HOGUE repeatedly texted photographs and videos of the marijuana grow to several different people, including a video of a grow house on May 26, 2022, a screenshot from which is depicted below:



162. On August 11, 2022, HOGUE texted another person, “I can tell you my days shittier,” followed by a screenshot of messages with “Pancho.” In the message, Pancho texts, “Thanks bro, but I jus pulled up to the farm and its raided, cops all over the place, I jus let semi know he’s figuring it out rn,” the other person in the exchange, believed to be HOGUE, responded, “Holy shit,” and Pancho replied, “Yea all bad barely made it out.” After sending the screenshot, HOGUE texted the other person, “Bet you your day got better in perspective,” followed by, “That’s my farm they are talking about fyi,” to which the other person responded, “well let’s say my day still blows but i am very sorry to hear that o was lookin forward to seeing the end result of that for you.”

163. Based on my training, experience, and knowledge of the investigation, Pancho notified HOGUE that law enforcement raided the marijuana grow and explained that he notified ABDELHAK, or “[S]emi,” who was determining how to respond. HOGUE then texted the screenshot of Pancho’s messages to the other person to advise him of the raid.

## **IX. JOCELYN FOSTER Obtaining Cocaine from SMITH and CHRISTMAN**

164. Between April 2024 and January 2025, law enforcement conducted six controlled purchases of cocaine from JOCELYN FOSTER in Johnstown and Gloversville. In total, JOCELYN FOSTER sold approximately 146.5 grams of cocaine for \$6,350.

165. SMITH supplied JOCELYN FOSTER with cocaine, which they discussed in text messages.

166. For instance, on October 17, 2023, JOCELYN FOSTER texted SMITH, "I'll give you what I owe but they want different the stuff from before," SMITH responded, "All I got is that intill I trip," followed by, "Reup," and JOCELYN FOSTER replied, "Okay." SMITH texted, "U will grab different shit this next one it should be next few days im Reil," followed by, "Reup," JOCELYN FOSTER responded, "Okay babe," and after SMITH replied, "I got u," followed by, "Next time be Easter if u just take a oz at time," JOCELYN FOSTER explained, "He wants a full next time anyways," followed by, "So I'm going to need to see him before I go out to work."

167. Based on my training, experience, and knowledge of the investigation, JOCELYN FOSTER's reference to "different stuff" refers to different cocaine, and SMITH's reference to "reup" refers to obtaining more cocaine for distribution. In writing, "just take a oz at time," SMITH referred to JOCELYN FOSTER obtaining an ounce, or "oz," of cocaine at a time.

168. On December 29, 2023, SMITH texted JOCELYN FOSTER, "How much u need," followed by, "I'll tell rob," JOCELYN FOSTER responded, "Full," and SMITH replied, "He be home 40 min and u can go grab when I get up there I figure out who u can go thro ur number might change with them u got to talk to them like I said pretty u said everything that need to be said between us," followed by, "The one grabbing from me I need nine hundred." After JOCELYN FOSTER answered, "What.....you put me on why does my shit have to change the only reason I even went with you is because of the number," SMITH replied, "Rob is home."

169. Based on my training, experience, and knowledge of the investigation, SMITH asked JOCELYN FOSTER the amount of cocaine she required and explained that he would tell "[R]ob," and JOCELYN FOSTER explained that she required an ounce of cocaine, or "[f]ull." SMITH explained that JOCELYN FOSTER could purchase the cocaine from "[R]ob" and that when SMITH arrived in the Johnstown area he would determine from whom JOCELYN FOSTER could purchase cocaine in the future but noted that the cost of the cocaine may increase. After SMITH explained that he would sell a person an ounce of cocaine for \$900, JOCELYN FOSTER asked why she needed to purchase cocaine from another person and explained that the only reason she started purchasing cocaine from SMITH was the price of the cocaine.

170. On April 12, 2024, JOCELYN FOSTER texted SMITH, "I've got your bread," SMITH responded, "He going to reach out to u," and JOCELYN FOSTER replied by "loving" SMITH's message and asked, "Why when I give cash my price goes up ♀." SMITH answered, "That's what I want for what I got left u don't have to buy it it's 35 gram intill the new comes in again u don't have to buy it," JOCELYN FOSTER responded, "Okay," and SMITH explained, "U can pay for what u owe and grab from who ever u want or u can grab it and deal with the few dollars extra and when the new comes ur number will go back to normal." JOCELYN FOSTER then explained, "Imma need 2 tomorrow and I'll have the money tomorrow too," and SMITH responded, "Okay."

171. Based on my training, experience, and knowledge of the investigation, JOCELYN FOSTER advised SMITH that she had his payment for cocaine; SMITH explained that another person would contact JOCELYN FOSTER; and JOCELYN FOSTER asked why the price of cocaine increases when she pays for cocaine in cash. SMITH explained that he was charging \$35

per gram of cocaine until he received a new shipment of cocaine and that the price of the cocaine would go back to normal once he received additional cocaine. JOCELYN FOSTER advised SMITH that she required “2,” believed to be two ounces of cocaine, the following day and would have payment.

172. CHRISTMAN also texted with JOCELYN FOSTER about cocaine trafficking.

173. For instance, on November 5, 2023, CHRISTMAN texted JOCELYN FOSTER, “Boot sent me your contact ?” JOCELYN FOSTER responded, “Who’s this,” CHRISTMAN answered, “Fremont,” directed JOCELYN FOSTER, “Meet me at hollys,” and explained, “I’m headed there from Meco now,” and JOCELYN FOSTER replied, “Okay I’m going to be like 30 mins.” CHRISTMAN asked, “Can I meet you somewhere then I’m kinda crunched for time,” JOCELYN FOSTER responded, “Fonda,” and CHRISTMAN replied, “Okay I’ll let you know when I’m leaving hollys.” Fifteen minutes later, JOCELYN FOSTER advised, “In Fonda.”

174. Based on my training, experience, and knowledge of the investigation, CHRISTMAN informed JOCELYN FOSTER that SMITH, or “Boot,” gave him JOCELYN FOSTER’s number. After JOCELYN FOSTER confirmed she was communicating with CHRISTMAN, or “Fremont,” CHRISTMAN instructed JOCELYN FOSTER to meet at “[H]olly[’]s” to conduct a drug transaction for SMITH. CHRISTMAN and JOCELYN FOSTER then arranged to meet in Fonda, New York, and JOCELYN FOSTER advised CHRISTMAN when she arrived in Fonda.

175. On February 4, 2024, CHRISTMAN texted JOCELYN FOSTER, “Hey I’m in town checkin in for bro if you have anything to grab while I’m up here,” to which JOCELYN FOSTER responded, “How long you around for.” Based on my training, experience, and knowledge of the investigation, CHRISTMAN advised JOCELYN FOSTER that he was in the Gloversville area, where JOCELYN FOSTER resided, and was checking to see if JOCELYN FOSTER had any cocaine proceeds for “bro,” which is believed to refer to SMITH, for CHRISTMAN to pick up when he was in the area before returning to Queens.

176. On March 23, 2024, JOCELYN FOSTER texted CHRISTMAN, “Hey,” CHRISTMAN responded, “What’s up ?” and JOCELYN FOSTER replied, “I need to see someone,” followed by, “I need at least another 1/2.” CHRISTMAN answered, “Got in,” followed by, “U\*.” Based on my training, experience, and knowledge of the investigation, JOCELYN FOSTER informed CHRISTMAN that she needed to obtain at least half of an ounce of additional cocaine, and CHRISTMAN agreed to provide the cocaine.

#### **X. ABDELHAK and CHAQUILL FOSTER Obtaining and Distributing Marijuana**

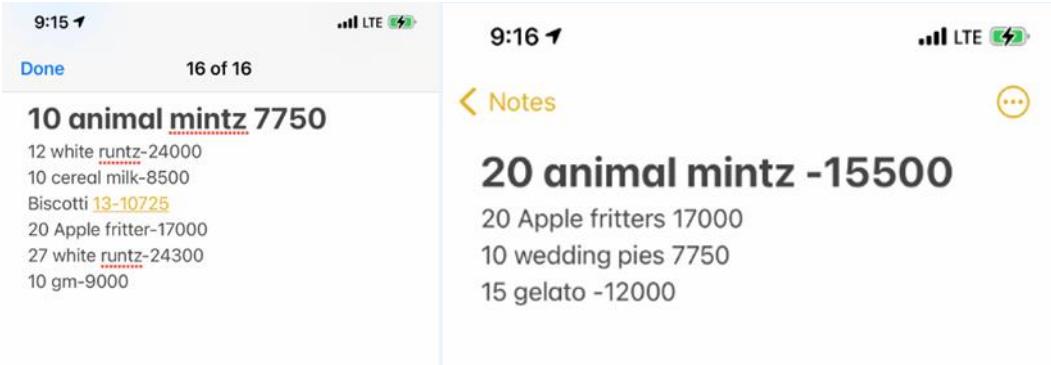
177. ABDELHAK and CHAQUILL FOSTER routinely obtained and distributed hundreds of pounds of marijuana.

178. In 2021, CHAQUILL FOSTER regularly texted with a marijuana supplier in New York City, Co-Conspirator-8 (“CC-8”), about marijuana trafficking, including with ABDELHAK.

179. For instance, on September 8, 2021, CC-8 texted CHAQUILL FOSTER, “You car is coming bro,” CHAQUILL FOSTER responded, “I know I’m omw there now,” and CC-8 replied,

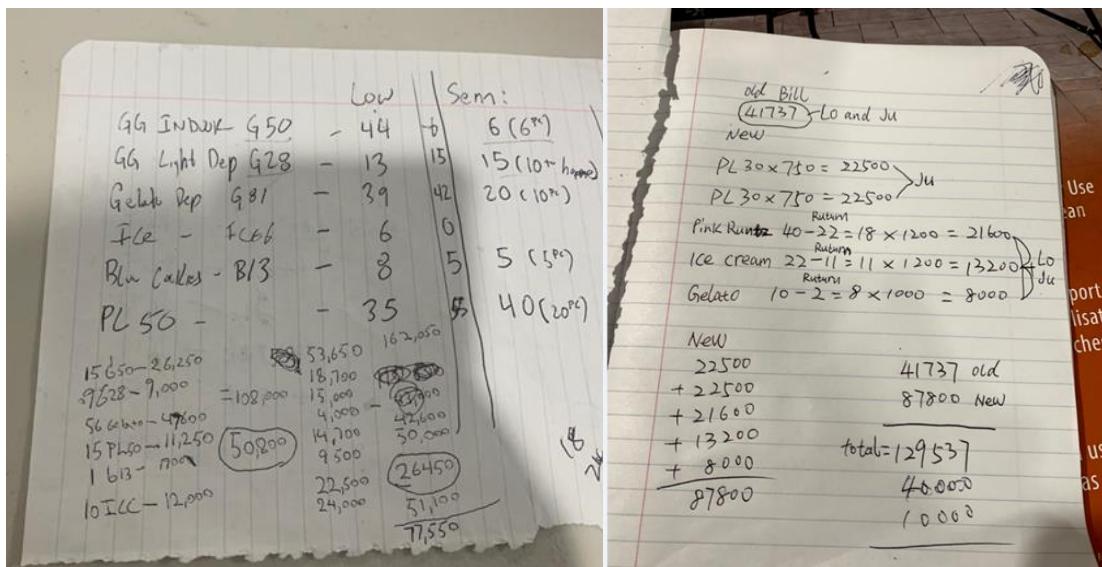
"Okay you driving?" After CHAQUILL FOSTER answered, "I'm with semi," CC-8 responded, "Ok," and an hour later, CHAQUILL FOSTER texted CC-8, "Gelatos in yellow bag?" Based on my training, experience, and knowledge of the investigation, CC-8 advised CHAQUILL FOSTER that a car delivering marijuana was arriving; CHAQUILL FOSTER explained that he was with ABDELHAK or "[S]emi"; and after taking delivery of the marijuana, CHAQUILL FOSTER asked CC-8 if "Gelato," which is a strain of marijuana, was in a yellow bag.

180. On September 30, 2021, CHAQUILL FOSTER texted CC-8 the following two screenshots of notes from an iPhone followed approximately four hours later by an address on Elmer Avenue in Schenectady:

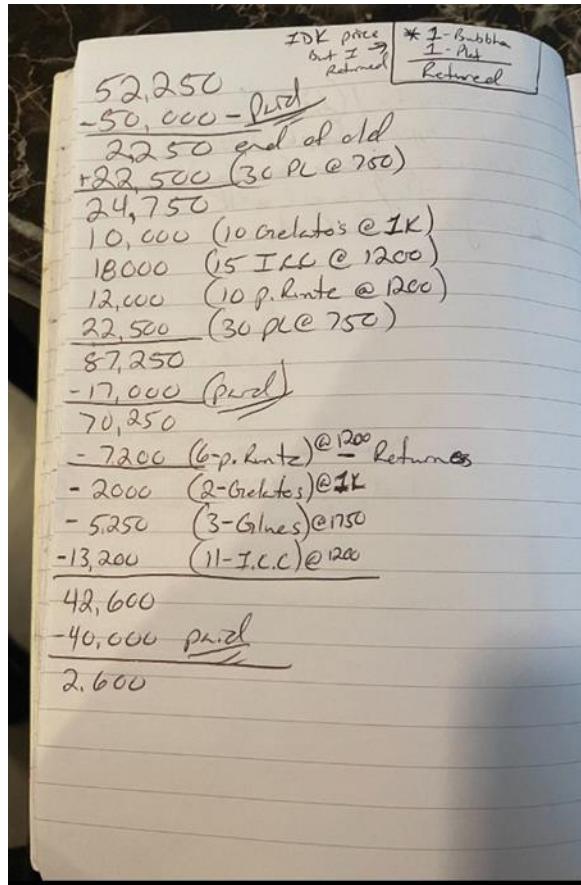


181. Based on my training, experience, and knowledge of the investigation, the notes reflect the number of pounds of particular strains of marijuana followed by the total price of the pounds of marijuana. For instance, "10" pounds of "animal mintz" marijuana for \$7,750, and "27" pounds of "white runtz" marijuana for \$24,300. In total, the notes reflect 167 pounds of various strains of marijuana for a total of \$153,525.

182. On December 11, 2021, CHAQUILL FOSTER texted CC-8 the following two photographs of handwritten notes:



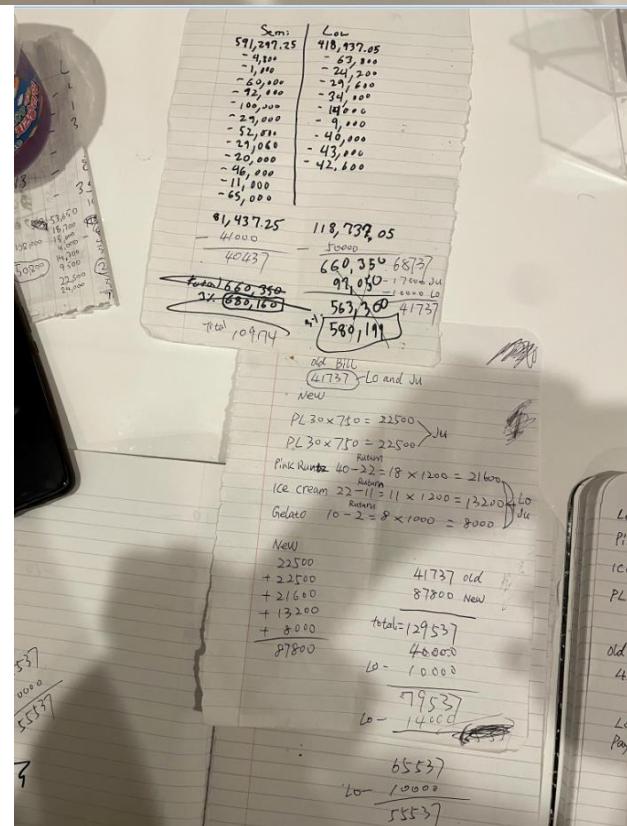
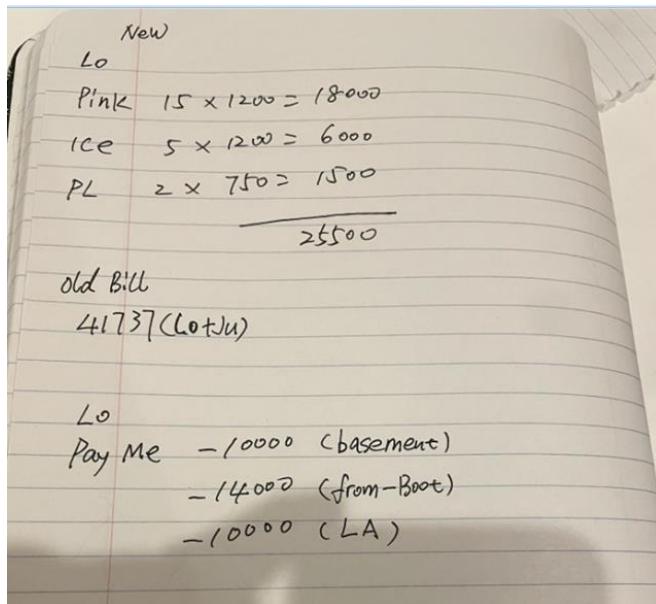
183. In response, CC-8 texted CHAQUILL FOSTER the following photograph of handwritten notes:



184. Based on my training, experience, and knowledge of the investigation, the handwritten notes texted between CHAQUILL FOSTER and CC-8 are drug ledgers reflecting quantities of marijuana purchased, returned, prices, and amounts paid and due. The notes reflect payments for marijuana from CHAQUILL FOSTER, or “Lo,” ABDELHAK, or “Semi,” and Co-Conspirator-9 (“CC-9”), who goes by “Ju.” For instance, the second ledger texted by CHAQUILL FOSTER to CC-8 states that “Lo and Ju,” i.e., CHAQUILL FOSTER and CC-9, owe \$129,537 for marijuana, with \$41,737 from an “old” bill and \$87,800 from a “new” bill; “Ju” twice purchased “30” pounds of marijuana for \$750 per pound, for a total of \$22,500; and “Lo” and “Ju” purchased “40” pounds of “Pink Runtz” marijuana, returned “22” pounds, and owe \$21,600 for “18” pounds of “Pink Runtz” marijuana at \$1,200 per pound.

185. On December 16, 2021, CC-8 texted CHAQUILL FOSTER, “Bro the driver come back to ny yet?” CHAQUILL FOSTER replied, “You gonna have to wait for boot to wake up to go grab it,” followed by, “Send me Ju number I lost it,” and CC-8 replied by texting CC-9’s phone number. Based on my training, experience, and knowledge of the investigation, CC-8 asked CHAQUILL FOSTER when a drug courier, or “driver,” returned to New York, and CHAQUILL FOSTER explained that CC-8 would need to wait for SMITH, or “[B]oot,” to either pick up marijuana or deliver marijuana proceeds to CC-8. CHAQUILL FOSTER then asked for CC-9’s cellphone number, which he referred to as “Ju number,” and CC-8 provided CC-9’s number.

186. On January 30, 2022, CHAQUILL FOSTER texted CC-8, “Send me picture of my payments that I made when you get a chance.” In response, CC-8 texted CHAQUILL FOSTER the following two photographs of handwritten notes:



187. Based on my training, experience, and knowledge of the investigation, CHAQUILL FOSTER asked CC-8 for records of his payments for marijuana, and CC-8 provided the handwritten drug ledgers in response. Among other things, the first note states, “-14000 (from—Boot),” which refers to \$14,000 in payment for marijuana from CHAQUILL FOSTER delivered

by "Boot," i.e., SMITH. The note at the top of the second photograph states, "Semi," above "591,297.25" followed by deductions, and "40,437," and "Low," above "418,937.05," followed by deductions, which refers to \$591,297.25 in marijuana purchased by ABDELHAK, or "Semi," with an outstanding debt of \$40,437, and \$418,937.05 in marijuana purchased by "Low," or CHAQUILL FOSTER, with an outstanding debt of \$68,737.

188. CC-8 sent CHAQUILL FOSTER several videos of large bags of marijuana, including on April 6, 2022, when he asked, "Lo do you like this stuff?" CHAQUILL FOSTER responded, "Looks good," "Have to see in person," followed by, "That's the stuff that semi looked at?" and CC-8 replied, "Not. I get that from other people." Based on my training, experience, and knowledge of the investigation, CC-8 sent CHAQUILL FOSTER the video of marijuana and asked if CHAQUILL FOSTER "like[d]" the marijuana; CHAQUILL FOSTER answered in the affirmative, but explained that he needed to see the marijuana in person, and asked if the marijuana in the video was the same marijuana CC-8 showed to "[S]emi," i.e., ABDELHAK; and CC-8 explained that the marijuana he showed to ABDELHAK was from a different source.

189. CHAQUILL FOSTER and ABDELHAK also communicated with Co-Conspirator-10 ("CC-10"), who resided in the Los Angeles area and brokered marijuana transactions.

190. For instance, on September 22, 2020, CC-10 messaged CHAQUILL FOSTER four videos of marijuana buds followed by, "og deps 15," CHAQUILL FOSTER asked, "How's the nose?" and in a voice message, CC-10 responded, "My boy says the nose is a eight." CHAQUILL FOSTER answered: "Okay if they still around when I'm ready I'll grab 10." Based on my training, experience, and knowledge of the investigation, CC-10 sent CHAQUILL FOSTER videos of marijuana for sale and explained that the marijuana, "og deps," cost \$1,500 per pound. CHAQUILL FOSTER inquired into the aroma of the marijuana; CC-10 explained that his associate said the aroma is an eight; and CHAQUILL FOSTER advised that he would purchase 10 pounds of the marijuana if it was still available when he is ready to purchase marijuana.

191. On July 9, 2022, CHAQUILL FOSTER messaged CC-10, "For the Asian in's I'm paying 1250 right now," "1200," followed by, "but that's in New York," CC-10 sent photographs of marijuana buds and asked, "What do you think?" and CHAQUILL FOSTER replied, "It looks li," followed by, "Deps right?" CC-10 responded, "Yea," CHAQUILL FOSTER asked, "Those from the farm?" and CC-10 answered, "nah my other buddy from [O]regon." Based on my training, experience, and knowledge of the investigation, CHAQUILL FOSTER advised CC-10 that he purchases marijuana grown indoors from "Asian[s]" in New York for \$1,250 and then \$1,200 per pound of marijuana. After CC-10 sent CHAQUILL FOSTER the photographs of marijuana buds and asked CHAQUILL FOSTER's view of the marijuana, CHAQUILL FOSTER explained that the marijuana looked high-quality and asked if the marijuana is light-deprived or "[d]eps." CC-10 answered in the affirmative; CHAQUILL FOSTER asked if the marijuana was from a particular farm; and CC-10 explained that the marijuana comes from Oregon.

192. On January 5, 2024, CC-10 sent ABDELHAK five videos of large bags of marijuana buds; ABDELHAK asked, "Ticket ?"; and CC-10 sent a voice message stating, "I think the OG is like 525 to me, so like 550 to you. And then the other ones would be like 575 to you. But they all passable." ABDELHAK responded, "I'll lyk." Based on my training, experience, and knowledge of the investigation, CC-10 sent ABDELHAK videos of marijuana for sale and ABDELHAK asked the price. In response, CC-10 explained that he believed he could purchase

"OG" marijuana for \$525 per pound; that it would cost ABDELHAK \$550 per pound; and that the other marijuana would cost ABDELHAK \$575 per pound. ABDELHAK then explained that he would let CC-10 know about purchasing the marijuana.

**XI. Conclusion**

193. Based on the foregoing, I respectfully submit that there is probable cause to believe that SAMER ABDELHAK, aka "Semi," LEON CHEN, aka "Don Eladio," MICHAEL HARPER, aka "Miz," ANTHONY MEDINA, aka "Tank," BROSLLOYD CAMPBELL, ANTHONY DIXON JR., CHAQUILL FOSTER, aka "Lo" and "Gucci," CHRISTOPHER SMITH, aka "Boot," JASON HOGUE, aka "Whispers," CHRISTOPHER CHRISTMAN, aka "Free," "Fremont," and "Puffy," CESAR ARIEL CASTRO-SANCHEZ, aka "Dom R," and JOCELYN FOSTER, aka "Jozzy," and others known and unknown, conspired to knowingly and intentionally distribute and possess with intent to distribute one or more controlled substances, in violation of 21 U.S.C. §§ 841(a)(1) and 846.

Attested to by the affiant.

Respectfully submitted,

**ROBERT WILLEY**  
(Affiliate)

Digitally signed by ROBERT  
WILLEY (Affiliate)  
Date: 2025.06.10 13:55:37 -04'00'

Robert Willey  
Task Force Officer  
Drug Enforcement Administration

I, the Honorable Daniel J. Stewart, United States Magistrate Judge, hereby acknowledge that this affidavit was attested to by the affiant by telephone on June 11, 2025, in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

Hon. Daniel J. Stewart  
United States Magistrate Judge